

# MARAVAI LIFESCIENCES

## Policy: Human Rights Policy

Revision: v.1

Effective Date: November 22, 2024

Policy Owner: Pete Leddy, PhD,  
CAO

Approved By: CAO

This HUMAN RIGHTS POLICY (this “**Policy**”) is binding upon you as an employee of Maravai Intermediate Holdings, LLC (“**Maravai**”) or one of its subsidiaries (collectively, the “**Company**”). Consult with the Company’s Chief Administrative Officer (“**CAO**”) at [pete.leddy@maravai.com](mailto:pete.leddy@maravai.com) or the Company’s General Counsel (“**General Counsel**”) at [kurt.oreshack@maravai.com](mailto:kurt.oreshack@maravai.com) if you have any questions about this Policy.

### 1. Purpose

- 1.1 The Company is committed to conducting business with the highest standard of ethics and integrity and complying with all applicable laws and respecting internationally recognized human rights. Maravai adopts this Human Rights Policy to respect, protect and promote human rights in all aspects of our work and interactions, including our relationships with our team members, customers, vendors and suppliers.

### 2. Scope

This Policy covers a wide range of business practices and procedures and is informed by the United Nations Guiding Principles on Business and Human Rights (the “**UN Guiding Principles**”). It does not cover every issue that may arise, but it establishes standards for business conduct and sets out basic principles to guide all employees of the Company on human rights issues, including slavery, servitude, forced or compulsory labor, human trafficking, child labor and other labor laws, fair compensation, freedom of association and collective bargaining, anti-discrimination and equal opportunity, fair treatment, and workplace safety. It also applies, as far as reasonably achievable, to our upstream and downstream supply chain through partners, suppliers and third party contractors (collectively, “**Business Partners**”).

If a law, rule, or court order conflicts with any part of this Policy, you must comply with the law, rule, or court order, as applicable. If you have any questions about these conflicts, you should immediately ask your supervisor or the General Counsel how to handle the situation. Employees are responsible for understanding the legal and policy requirements that apply to their jobs and report any suspected violations of law, this Policy to their supervisor or the General Counsel. You may report any concerns or potential violations to your supervisor, Human Resources, an Ethics Liaison or the Legal Department.

### 3. Policy Principles and Commitments

- 3.1 **Compliance with Labor Laws:** All employees of the Company must comply, in both letter and spirit, with all labor laws, rules and regulations applicable to the Company in the cities, states and countries in which the Company operates or does business. Although not all employees are expected to know the details of all applicable laws, rules and regulations, it is important to know enough to determine when to seek advice from appropriate personnel.

#### 3.2 **Forced Labor / Slavery / Human Trafficking:**

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- 3.2.1 We have zero tolerance for modern slavery, forced labor and human trafficking, and our operations must be free from these practices. The Company must not use, knowingly benefit from, or be knowingly complicit in, the use of forced or involuntary labor – whether bonded (including debt bondage), imprisoned or indentured – including human trafficking, modern slavery, or any other exploitative labor practices.
- 3.2.2 All employees must be employed voluntarily, with employees free to terminate their employment with the Company freely at any time (subject to statutory notice periods, as applicable) and without penalty. Furthermore, employees of the Company shall not (either directly or indirectly via an agent of the Company) withhold or destroy employee identity or immigration documents, passports, or work permits.

### 3.3 Child Labor:

- 3.3.1 The Company prohibits the hiring of individuals under 18 years of age for positions that are likely to jeopardize their health or safety. Furthermore, the Company shall generally avoid employing any individual under the age of 18 years absent extraordinary circumstances, and any such hire must be approved by Maravai's Chief Executive Officer or Chief Administrative Officer. Notwithstanding the foregoing, no child under 18 years of age may be employed by the Company for work that is likely to jeopardize their health or safety.
- 3.3.2 The Company shall not knowingly do business with Business Partners that allow employees under the age of 18 to work in operations or jobs that may be hazardous to their health or safety.

3.4 **Fair Compensation:** The Company must comply with applicable wage laws, including minimum wage, work hours, overtime, wage payment, and benefits laws. Furthermore, the Company shall not use fraudulent or misleading practices during the recruitment or employment process, and shall provide fair compensation for all employees that meets or exceeds the applicable minimum wage and associated statutory benefits. All overtime served by employees must be voluntary.

3.5 **Freedom of Association and Collective Bargaining:** The Company shall respect the right of eligible employees under the National Labor Relations Act (the “Act”) to form and join trade unions. The Company shall not unlawfully interfere with or restrict eligible employees' ability to choose whether to be a member of a trade union or to bargain collectively as permitted by the Act. Employees shall be free to communicate openly with management regarding working conditions without threat of reprisal, termination, harassment, or intimidation.

3.6 **Anti-Discrimination and Equal Opportunity:** The Company strictly prohibits discrimination based on an applicant's or employee's actual or perceived race (including traits historically associated with race, such as hair texture and protective hairstyles), color, religious creed, sex and gender, gender identity or expression, pregnancy, childbirth or lactation and related

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medical conditions, sexual orientation, national origin, ancestry, citizenship status, age (40 and over), physical or mental disability, medical condition, genetic information, marital status, veteran or military status (including registered domestic partnership status), or any other characteristic protected by state, federal, or local law. This prohibition applies to all aspects of employment, including but not limited to hiring, job assignment, compensation, promotion, benefits, training, discipline, and termination.

**3.7 Fair Treatment / Harassment:** Maravai is committed to providing a work environment free of sexual or any form of harassment, discrimination, bullying or retaliation. Harassment or discrimination against individuals based on race (including traits historically associated with race, such as hair texture and protective hairstyles), religious creed, color, national origin, citizenship status, ancestry, sex and gender (including pregnancy, childbirth, lactation and related medical conditions), sexual orientation, gender identity or expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender with which they identify), genetic information, age (40 and over), physical or mental disability, medical condition, marital status (including registered domestic partnership status), Civil Air Patrol status, military or veteran status, volunteer or internship status, or any other classification protected by state, federal or local laws is prohibited.

### **3.8 Diversity, Equity & Inclusion:**

3.8.1 Maravai aims to foster an inclusive environment that promotes personal and professional growth. The Company's decisions regarding recruitment, hiring, placement, compensation, training, development and advancement are based on an individual's qualifications, performance, skills and experience. In addition to our commitment to providing a workplace free of discrimination and harassment, we require employees to complete trainings on unconscious bias, harassment and discrimination.

3.8.2 Where feasible operationally, the Company shall use commercially reasonable efforts to include small and diverse-owned subcontractors in its supply chain where opportunities exist, including, for example, those owned by minorities or any others who are socially disadvantaged.

**3.9 Reasonable Accommodation:** The Company shall provide reasonable accommodations for the known physical or mental disability or known medical conditions or sincerely held religious beliefs, practices, or observances of an applicant or employee, upon request. As part of its commitment to make reasonable accommodations, the Company wishes to participate in a timely, good faith, interactive process with qualified job applicants or employees to determine effective reasonable accommodations, if any, that can be made in response to a request for accommodations. The Company also does not retaliate or otherwise discriminate against applicants or employees who request a reasonable accommodation for reasons related to disability or religion.

### **3.10 Workplace Safety:**

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3.10.1 Maravai is strongly committed to providing a safe and healthy workplace. To this end, the Company's businesses shall: operate in a manner that protects the safety and health of its employees, contractors and agents; provide the necessary resources to maintain safe and healthy workspaces; identify and take reasonable measures to mitigate or eliminate potential workplace hazards; and train and empower employees to identify and report unsafe conditions and/or halt operations until such conditions are remedied. In addition to the foregoing, all employees of the Company are expected to abide by Maravai's EHS Policies.

3.10.2 Furthermore, threats, threatening language or any other acts of aggression or violence made toward or by any Company employee will not be tolerated. For purposes of this Policy, a threat includes any verbal or physical harassment or abuse, any attempt at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious, or destructive action.

3.11 **Due Diligence:** In accordance with the UN Guiding Principles, we are committed to implementing a reasonable level of due diligence to identify adverse impacts on human rights as described above and to establish or support appropriate and effective mechanisms for prevention and remediation thereof.

## **4. Reporting Violations or Concerns**

4.1 If you become aware of, or have reason to believe there has been, the violation of this Policy, whether by its directors, officers or employees, you are expected to promptly report the matter to your supervisor, a member of the Company's Legal Department, or contact the Ethics Hotline. Reports to the Ethics Hotline may be made by phone at (866) 860-0008 (English) or (800) 216-1288 (Spanish) or by email to reports @lighthouse-services.com (must include the Company's name with the report)

4.2 Maravai does not tolerate acts of retaliation against any director, officer, or employee who makes a good faith report of known or suspected violations of this Policy, and any such retaliation may be a violation of the Company's Whistleblower Policy.

## **5. Enforcement**

5.1 Upon a determination that there has been a violation of this Policy, the Company will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.

## **6. Policy Governance:**

6.1 This Policy is overseen by Pete Leddy, PhD, CAO.