
MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDING 30 JUNE 2024

1 INTRODUCTION

- 1.1 Trajan Group Holdings Limited ACN 152 617 706 is an Australian public company listed on the Australian Securities Exchange (ASX: TRJ) (**Trajan**, **'we'**, **'us'**, or **'our'**).
- 1.2 This is Trajan's third Modern Slavery Statement published pursuant to the *Modern Slavery Act 2018* (Cth) (**Act**). It identifies the steps that Trajan, including its wholly owned and controlled entities,¹ has taken and will continue to take to assess and address modern slavery risk arising in connection with our domestic and global operations and supply chain, in the financial year ending June 2024.
- 1.3 Trajan's previous Modern Slavery Statements are available at <https://investor.trajanscimed.com/corporate-governance>.

2 A MESSAGE FROM THE CEO

- 2.1 *Over the past 12 months, Trajan has continued to grow as a business, guided by our mission to deliver value through collaboration with likeminded people and organisations, developing leading analytical technologies and agile commercial partnerships to deliver breakthrough solutions to the world. These scientific tools and solutions are specifically designed to enrich human health and wellbeing.*
- 2.2 *Our third Modern Slavery Statement reflects our ongoing commitment to ensure that in delivering on our mission, we reject all forms of modern slavery and respect the human rights and fundamental freedoms of those individuals in our operations and broader supply chain.*
- 2.3 *As a values and purpose-led organisation with employees, customers, suppliers and other business partners around the world, we are continuing to enhance our knowledge and understanding of global modern slavery risks, and to introduce policies and processes which will enable us to effectively identify and address those risks.*

Stephen Tomisich
Chief Executive Officer

3 TRAJAN'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS***Trajan's structure and operations***

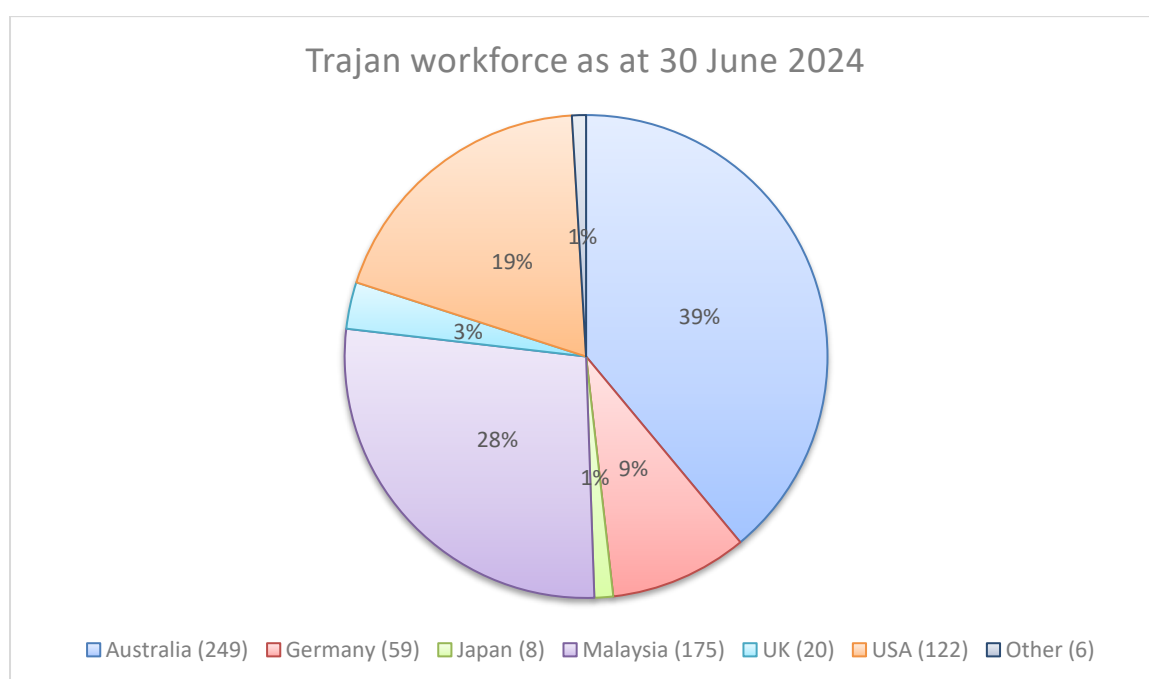
- 3.1 Trajan was listed on the ASX in June, 2021. With global headquarters in Ringwood, Australia, Trajan is a purpose led business that aims to enrich personal health through scientific tools and solutions.
- 3.2 We do this through the design, manufacture and supply of analytical and life sciences products, devices, systems and solutions that are used in the collection, preparation or analysis of biological, food, water, and environmental samples by customers located around the world. Trajan has developed a portfolio of innovative technologies and devices to support

¹ A list of Trajan's subsidiaries as at 30 June 2024 is included at Annexure A.

the trend towards decentralised, personalised data-based healthcare. Further, Trajan has a pipeline of new technologies under development which includes micro-sampling devices, novel sample preparation chemistries and a portable modular analytical instrument system.

Trajan's growth strategy includes the acquisition and integration of complementary businesses and product offerings. As part of any acquisition, Trajan conducts due diligence (including legal and operational due diligence) on proposed targets. As set out in our first Modern Slavery Statement, during financial year ended 30 June 2022, Trajan completed four significant acquisitions (namely of Axel Semrau GmbH & Co, Neoteryx LLC, the LEAP Pal Parts and Consumables business and Chromatography Research Supplies, Inc). Our second Modern Slavery Statement noted that during the financial year ended 30 June 2023, work was undertaken across various areas to integrate those recently acquired businesses into the Trajan group, and Trajan also completed the acquisition of the HDExaminer software business. During the financial year ended 30 June 2024, Trajan did not complete any acquisitions but was focused on leveraging current resources and capabilities to support the strategic growth of existing business activities.

- 3.3 Trajan has now built a global infrastructure of operations in Australia, Europe, the US, and Asia, with seven dedicated precision manufacturing facilities in Australia, Europe, Malaysia, and the US. As at 30 June 2024, Trajan had a workforce of 639 people located as shown below.



- 3.4 More information about the Trajan business can be found on our website: www.trajanscimed.com.

Trajan's supply chain

- 3.5 Trajan's procurement activities are largely centralised, with senior leadership and managers having oversight over our global operations. This helps to achieve consistency, accountability and transparency at the decision-making level of our business.
- 3.6 The majority of Trajan entities use the 'Pronto ERP' system for purchasing, sales and inventory management. For purchases during the financial year ended 30 June 2024, Trajan's global supplier base, as listed in Pronto, included approximately 1600 suppliers. As noted in Trajan's previous Modern Slavery Statement, for purchases during the financial year ended

30 June 2023, the Pronto system included approximately 1475 suppliers, indicating that the number of suppliers used by Trajan has increased as a reflection of business growth.

- 3.7 To support our manufacturing, research and development operations, Trajan procures a range of goods and services globally. These goods and services range from the procurement of raw materials and componentry used to manufacture our devices through to finished goods, capital equipment and professional services.
- 3.8 The materials primarily sourced by Trajan include borosilicate glass tubing, sourced through two major suppliers in Europe and the United States, graphite ferrule blanks sourced through a single major supplier in the United States and silicon sourced through a small number of major suppliers in the United States. We also undertake conflict mineral due diligence of our supply chain through use of the Assent platform.
- 3.9 Trajan's top ten largest suppliers by expenditure in the financial year ended 30 June 2024 were located in the following jurisdictions:
- Switzerland
 - USA
 - Germany
 - Taiwan
 - Japan
 - Australia
- 3.10 Trajan's seven manufacturing sites are primarily involved in the following production activities:
- (i) Ringwood, Australia: advanced manufacturing for analytical components and consumables through high precision engineering.
 - (ii) Austin, Texas, USA: precision glass manufacturing and product assembly for analytical consumables product lines.
 - (iii) Raleigh, North Carolina, USA: designing and manufacturing laboratory workflow automation solutions including integrating instruments and tailoring software solutions.
 - (iv) Louisville, Kentucky, USA: manufacturing of analytical consumables such as gas purifiers, ferrules and septa.
 - (v) Bethel, Connecticut, USA: manufacturing of analytical consumables including caps and septa.
 - (vi) Penang, Malaysia: high precision glass product assembly for analytical product lines along with kits and key components for instrument manufacturers in the food, biopharma and environmental analytical sectors.
 - (vii) Sprockhovel, Germany: laboratory automation systems including integrating instruments and tailoring software solutions at customers' sites.

4 RISK OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAINS

- 4.1 Trajan operates in the global analytical science instrument and device industry. Recognising that certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes, we consider our products and services to have a lower risk based on the geography of our top suppliers, the sophistication of our top suppliers (being large conglomerates), the sector we operate in and the level of control and oversight we maintain through our internal technical and manufacturing capabilities.

- 4.2 As stated in our Modern Slavery Statement for the financial year ended 30 June 2023, recognising that Trajan is continuing to develop our modern slavery program, and being committed to identifying and mitigating the risk that Trajan is exposed to modern slavery in our operations and supply chain, we engaged an external third party to conduct a modern slavery risk assessment of our global procurement function. The risk assessment considered the nature of our supply chain and relevant risk indicators such as the geographical location of our suppliers and the types of products and materials that we purchase. The risk assessment was finalised in October 2023. Trajan has developed and started implementing a work plan based on the recommendations in the risk assessment to ensure that we take a proportionate, risk-based approach in continuing to develop and implement our modern slavery program.
- 4.3 In relation to managing risks within our own operations, Trajan employs the vast majority of its staff directly through its group entities around the world. Trajan has a dedicated HR department, with experienced personnel to support our staff in each of the jurisdictions where we operate, which oversees our systems and processes regarding the recruitment, onboarding and retention of staff including by ensuring all statutory entitlements are observed.
- 4.4 To provide additional production capacity at our manufacturing sites, we engage a small number of staff members (27 as at 30 June 2024) indirectly through labour hire organisations, with such staff members based in Australia and the United States of America.
- 4.5 All Trajan employees are employed on terms which meet or exceed the minimum wage and other requirements under applicable employment laws.
- 4.6 Trajan is committed to recognising and managing our ethical and legal responsibilities under workplace health and safety legislation to provide a safe and healthy workplace. This includes that all new employees are given basic safety training as an essential part of their induction.

5 ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

- 5.1 Trajan's business ethos is driven by delivering impact and customer value in ways that reflect our core values and support our purpose; science that benefits people and society at large. We are committed to developing our modern slavery program as we continue to mature and grow.

Our Policies

(a) Modern Slavery Policy

In February 2024, Trajan introduced a new Modern Slavery Policy approved by Trajan's Board.

The Modern Slavery Policy applies to all persons working for Trajan or on its behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents and contractors. The policy outlines Trajan's approach to addressing modern slavery risks in our operations and supply chain, the standard of behaviour that Trajan expects from employees, officers, customers and suppliers, and the process for dealing with any identified concerns.

The Modern Slavery Policy also notes the appointment of a Modern Slavery Officer to have primary and day to day responsibility for implementing the policy, monitoring its use and effectiveness and dealing with any queries about it. The Modern Slavery Officer will oversee the handling of any report made under the Modern Slavery Policy.

A copy of Trajan's Modern Slavery Policy is available on our website:
<https://investor.trajanscimed.com/corporate-governance>

(b) **Trajan Code of Conduct** - The Code of Conduct provides an ethical framework to guide our daily interactions with each other, our customers who use our products, the business community and governments around the world so all of Trajan's employees (including temporary employees, contractors and Directors) must comply with the Code of Business Ethics. All Trajan employees are required to complete a module on the Code of Conduct in Trajan's Learning Management System. A copy of the Trajan Code of Conduct is available on our website:
<https://investor.trajanscimed.com/corporate-governance>

(c) **Whistleblower Policy** - To encourage all our employees and business partners to promptly come forward with questions or concerns about possible violations of laws (including suspected instances of modern slavery), the Code of Conduct, ethical business standards, accounting and auditing standards, or Trajan policies, the Whistleblower policy:

- encourages people to raise any concerns and report instances of Reportable Conduct where there are reasonable grounds to support such action, without fear of intimidation, disadvantage or reprisal;
- outlines the mechanisms for the reporting and investigation of reported matters;
- outlines the measures in place to protect a whistleblower; and
- promotes a workplace environment in which everyone feels safe, supported and encouraged to make reports about Reportable Conduct.

A copy of the Whistleblower Policy is available on the Company's website:
<https://investor.trajanscimed.com/corporate-governance>

(d) **Board and Audit & Risk Committee responsibilities** - The Board requires that management creates a culture within the Trajan company which promotes ethical and responsible behaviour. Under its Charter, the Board is responsible for receiving and evaluating reports from management about breaches of the Code of Conduct and for receiving and evaluating reports about matters reported under the Whistleblower Policy. Meanwhile, the Audit and Risk Committee is responsible for ensuring that the Company has appropriate processes in place to identify and manage to the extent reasonably practicable all material risks that may impact the Company.

A copy of the charter for the relevant charters are available on the Company's website:
<https://investor.trajanscimed.com/corporate-governance>

Training

5.2 In November 2023 Trajan implemented a modern slavery training module which is mandatory for all employees to complete through Trajan's Learning Management System. The training module provides an overview of modern slavery and how to identify risks. As at 30 June 2024, 85% of Trajan employees had completed the training module. All Trajan employees are also required to read and be familiar with the company's Modern Slavery Policy, and to acknowledge that any queries or concerns should be raised with Trajan's Modern Slavery Officer.

Supplier risk assessment

5.3 During the financial year ended 30 June 2024, Trajan developed a process for rating and recording a supplier's risk of modern slavery using a two-tiered approach based on the geographical location of the supplier and the nature of the products supplied to Trajan. The identification of higher risk countries and products is based on information set out in the modern slavery risk assessment referred to in paragraph 4.2 above.

- 5.4 The process for rating and recording a supplier's risk is being implemented in Trajan's Pronto ERP system and requires procurement team members to enter data based on geographical location and product type at the time purchase orders and requisitions are processed. The risk rating process is therefore being used to evaluate existing suppliers and new suppliers that have been onboarded. Based on the data that is entered for a supplier, their risk of modern slavery is recorded as high, medium or low.
- 5.5 During the next reporting period, Trajan will build on this supplier risk rating process in Pronto to develop a formalised process for conducting additional due diligence steps for suppliers that have been rated as having a medium or high risk of modern slavery. This may include for example asking such suppliers to complete a questionnaire regarding their workforce, worksites, labour practices, and policies and processes for preventing forced and child labour. The actions to be taken to mitigate identified risks will then depend on the circumstances.

6 EFFECTIVENESS IN COMBATting MODERN SLAVERY RISKS

- 6.1 Trajan's senior leadership and executive are driving the implementation of our modern slavery program. Alongside our existing business practices and risk management strategies, this program will enhance our ability to demonstrate our core values and purpose to enrich human wellbeing across our internal and external business dealings. We are a business that is continuously evolving and improving. As part of this journey, and in recognition that Trajan is developing and implementing our modern slavery program, practices and procedures will be adapted over time with their effectiveness periodically reviewed.

Further steps

- 6.2 During the current reporting period, Trajan will continue implementing the recommendations from the modern slavery risk assessment completed by our external third-party provider in relation to our global procurement operations. The remaining recommendations to be implemented include:
 - (a) completing the implementation of the supplier due diligence process using the data recorded for a supplier in Pronto, with a formalised process for additional due diligence steps to be taken for suppliers identified as having a higher risk of modern slavery in their operations or supply chain;
 - (b) continuing to conduct a modern slavery training program targeting appropriate personnel informed by the modern slavery risk assessment and Modern Slavery Policy referred to above; and
 - (c) developing and introducing a process to measure the effectiveness of Trajan's actions to mitigate and remediate risks of modern slavery.

7 CONSULTATION & CERTIFICATION

- 7.1 In developing this modern slavery statement, we engaged with key business areas responsible for procurement, risk and legal. Given the largely centralised nature of our business, consultation is integrated in our operating model throughout the year. Furthermore, Trajan ensures that there is commonality on each of the boards of the entities it owns and controls (noting that there is a transition period as new entities are acquired or formed and integrated into the group), such that the executive at every level of the business is informed and across our group level systems and processes.
- 7.2 This Statement has been approved by the board of directors, in their capacity as principal governing body of Trajan Group Holdings Limited ACN 152 617 706.

7.3 This Statement is signed by Stephen Tomisich in his role as a board member of Trajan Group Holdings Limited.

Signature: S. A. Tomisich

Date: 20 December 2024

ANNEXURE A

1. Trajan Scientific Australia Pty Ltd ACN: 161 314 969
2. Grale Scientific Pty Ltd ACN 152 617 573
3. Trajan Scientific and Medical Pty Ltd ACN: 161 305 764
4. Trajan Accelerator Pty Ltd ACN 164 696 682
5. Trajan Nutrition Pty Ltd ACN 622 658 940
6. Biopsy Solutions Pty Ltd ACN 651 592 184
7. Trajan Scientific Switzerland Sàrl
8. Trajan Scientific Americas Inc (formally SGE Inc)
9. Neoteryx LLC
10. Chromatography Research Supplies, LLC (formerly Chromatography Research Supplies, Inc.)
11. Trajan Scientific Malaysia Sdn Bhd
12. Trajan Scientific Japan Inc
13. Trajan Scientific Germany Holdings GmbH
14. Axel Semrau GmbH
15. Trajan Scientific Germany Property GmbH
16. Trajan Scientific Europe Ltd
17. Trajan Scientific Germany GmbH
18. Scientific Glass Manufacturing (U.K) Ltd