
MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDING 30 JUNE 2023

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 second 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 2023.
- 1.3 Trajan's previous Modern Slavery Statement is available at <https://investor.trajanscimed.com/corporate-governance>.

2 A MESSAGE FROM THE CEO

- 2.1 *Modern slavery breaches the most fundamental freedoms and human rights of individuals. Trajan rejects all forms of modern slavery and recognises that modern slavery is never acceptable in any of its forms.*
- 2.2 *Trajan's second Modern Slavery Statement affirms our ongoing commitment to identify and mitigate the modern slavery risks that we may be exposed to in the course of our business. This commitment is underpinned by our core values of integrity, respect, empowerment, discipline and diversity. As we deliver on our strategy to build a global business of scale to have a positive impact on human health, we have zero tolerance for any form of human exploitation. We expect those who work for us to act ethically and with integrity in all of their business dealings and relationships, and we expect the same high standards from our suppliers and other business partners.*
- 2.3 *As we work to develop and deliver scientific tools and solutions for our customers in the clinical, pharmaceutical, environmental and food sectors, we will continue to deepen our understanding of modern slavery risks and continually improve how we assess and address those risks in our operations and supply chain.*

Stephen Tomisich
Chief Executive Officer

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

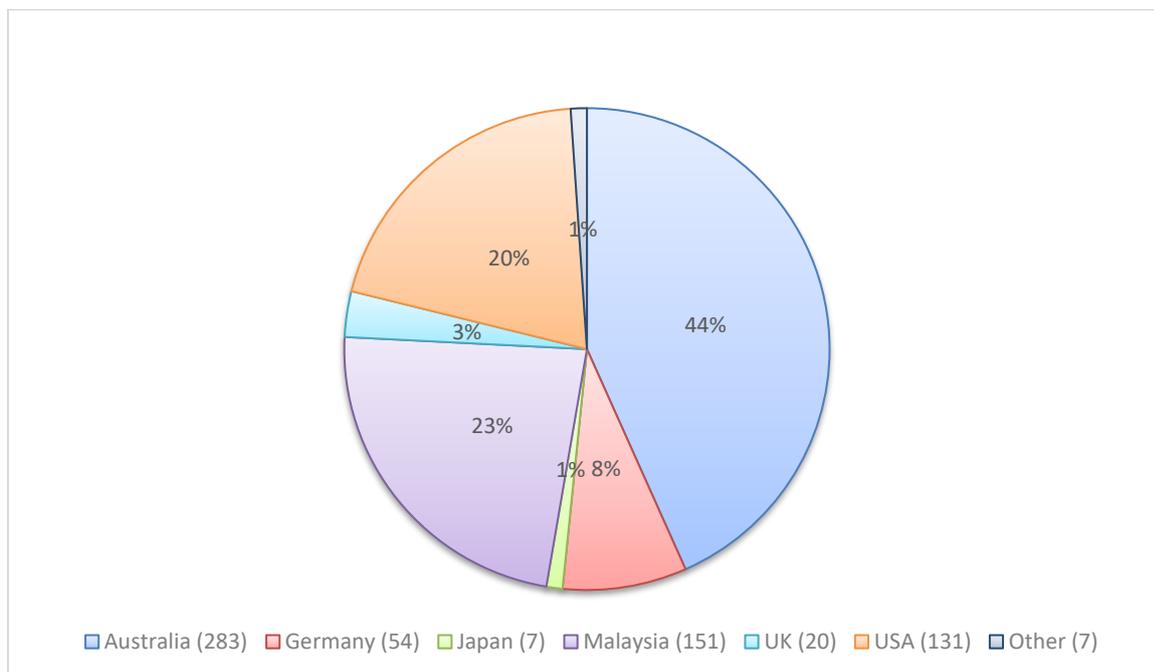
- 3.1 Trajan was listed on the ASX in June, 2021. With global headquarters in Ringwood, Australia, Trajan is a purpose led business that aims to enrich personal health through scientific tools and solutions.

¹ A list of Trajan's subsidiaries as at 30 June 2023 is included at Annexure A.

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 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). During the financial year ended 30 June 2023, work was undertaken across various areas to integrate those recently acquired businesses into the Trajan group. Trajan also completed the acquisition of the HDExaminer software business. HDExaminer enables the analysis of protein structural information generated by a mass spectrometer.

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 2023, Trajan had a workforce of more than 650 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 last reporting period, Trajan’s global supplier base, as listed in Pronto, included approximately 1,475 suppliers. As noted in

Trajan's first Modern Slavery Statement, for purchases during the financial year ended 30 June 2022, the Pronto system included approximately 1500 suppliers, indicating that the number of suppliers used by Trajan remained largely consistent.

- 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 2023 were located in the following jurisdictions:
- Switzerland
 - Singapore
 - USA
 - 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 product lines and complex precision engineering.
 - (ii) Austin, Texas, USA: precision glass manufacturing and product assembly for analytical product lines.
 - (iii) Raleigh, North Carolina, USA: laboratory automation systems including integrating instruments and tailoring software solutions at customers' sites.
 - (iv) Louisville, Kentucky, USA: manufacturing of analytical consumables such as gas filters, ferrules and septa.
 - (v) Bethel, Connecticut, USA: manufacturing of analytical consumables including caps and septa.
 - (vi) Penang, Malaysia: precision glass product assembly for analytical product lines along with kits and key components for instrument manufacturers in the analytical and biochemical marketplace.
 - (vii) Sprockhovel, Germany: laboratory automation systems including integrating instruments and tailoring software solutions at customers' sites.
- 3.11 During the financial year ended 30 June 2023, the COVID-19 pandemic-related delays and disruptions in the supply of critical materials, components and devices that Trajan experienced during the financial year ended 30 June 2022 began to reduce and there were improvements in supplier reliability and logistics services.

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 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 outcomes from the risk assessment will assist Trajan in taking 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 (less than 10 as at 30 June 2023) indirectly through labour hire organisations, with all such staff members based in Australia.
- 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) **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. A copy is available on our website: <https://investor.trajanscimed.com/corporate-governance>
- (b) **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 is available on the Company's website:

<https://investor.trajanscimed.com/corporate-governance>

- (c) **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>

Modern Slavery Policy

During the last reporting period, we worked on developing a new Modern Slavery Policy which 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.

As at the date of this statement, the new Modern Slavery Policy has been approved by Trajan's Board and it will be implemented in early 2024.

Supplier onboarding

- 5.2 Trajan has in place a procedure titled "*Supplier Evaluation and Monitoring*" which sets out a process for new supplier evaluation, risk assessment and ongoing risk/performance review. The scope of the procedure covers risks relating to product quality, safety, regulatory compliance and supply chain performance. We reviewed the scope of the procedure in the course of our modern slavery risk assessment, and we will broaden its scope to include an assessment and rating of modern slavery risks.

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 start implementing the recommendations from the modern slavery risk assessment completed by our external third-party provider in relation to our global procurement operations. Those recommendations include:
- (a) the implementation of the Modern Slavery Policy;
 - (b) the appointment of a Modern Slavery Officer to oversee the implementation of the Modern Slavery Policy and Trajan's other activities with respect to its modern slavery program;
 - (c) enhanced supplier due diligence, with additional due diligence steps to be taken for suppliers identified as having a higher risk of modern slavery in their operations or supply chain; and
 - (d) a dedicated modern slavery training program targeting appropriate personnel informed by the modern slavery risk assessment and Modern Slavery Policy referred to above.

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 board member of Trajan.

Signature: *S A Tomisich*

Date: 6 December 2023

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, Inc
11. Trajan Scientific Malaysia Sdn Bhd
12. Trajan Scientific Japan Inc
13. Trajan Scientific Germany Holdings GmbH
14. Axel Semrau GmbH & Co. KG
15. Trajan Scientific Germany Property GmbH
16. Trajan Scientific Europe Ltd
17. Trajan Scientific Germany GmbH
18. Scientific Glass Manufacturing (U.K) Ltd