
MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR ENDING 30 JUNE 2022

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 statement is 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 2022.

2 A MESSAGE FROM THE CEO

- 2.1 *In recognition that modern slavery is a gross violation of fundamental human rights, this statement reflects Trajan's ongoing commitment to being ethical, transparent and accountable.*
- 2.2 *Since it was founded in 2011, Trajan's mission has been to deliver science that benefits people. We do this by providing scientific tools and solutions that are used in the analysis of biological, food, water and environmental samples to enrich human wellbeing. As an organisation, we are driven by our core values of integrity, respect, empowerment, discipline and diversity. These values are embedded in the way we engage with all of our stakeholders, from our staff and their families, to our investors, customers and suppliers. We publish this statement not only to meet our compliance obligations but to take the opportunity to reiterate that Trajan is a purpose and values led organisation with zero tolerance for any form of human exploitation. We welcome the opportunity to reflect on and enhance how we manage risks in this area.*
- 2.3 *To this end, as our business continues to grow, we present our first modern slavery statement and are committed to continually improving the steps we take to identify and combat modern slavery risk that may arise in connection with our operations and supply chains.*

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 analysis of biological, food, water, and environmental samples by customers located around the world. Trajan has also

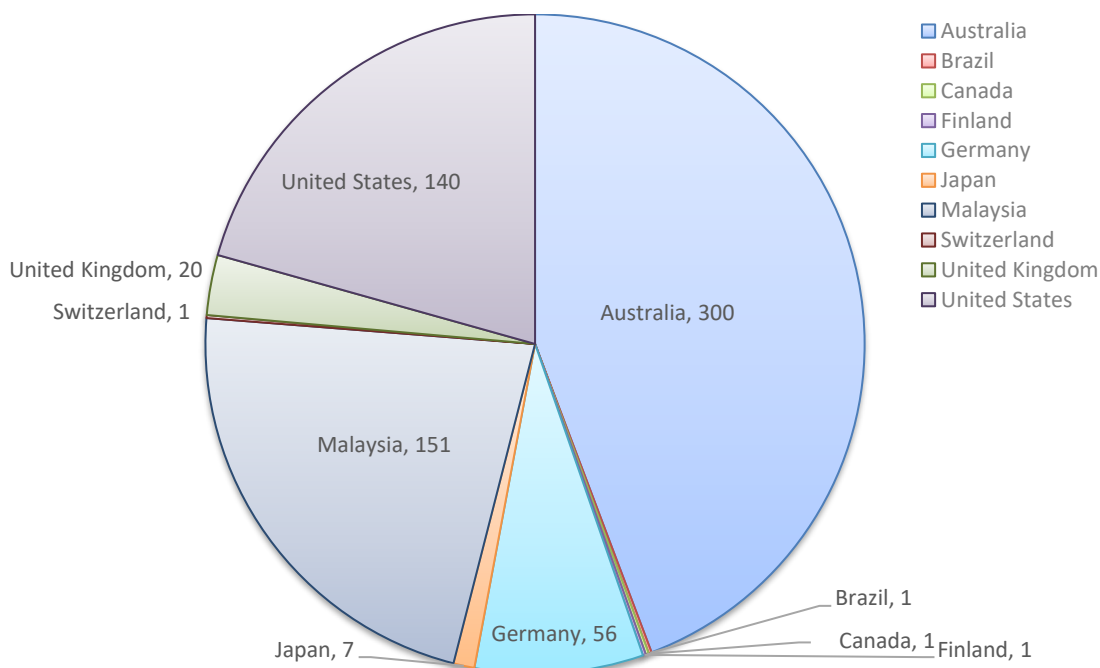
¹ A list of Trajan's subsidiaries is included at Annexure A.

developed a portfolio of innovative technologies and devices to support the trend towards decentralised, personalised data-based healthcare.

3.3 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. During the financial year ending June 2022, Trajan completed the following four acquisitions:

- in November 2021, Trajan acquired Axel Semrau GmbH & Co, a company based in Germany which designs, develops and delivers laboratory automation and chromatography software and detection systems;
- in December 2021, Trajan acquired Neoteryx LLC, a company based in California which is a global leader in blood microsampling devices;
- in December 2021, Trajan acquired the LEAP Pal Parts and Consumables business based in North Carolina, which specialises in laboratory instrumentation and liquid handling consumables for automation equipment; and
- in June 2022, Trajan acquired Chromatography Research Supplies, Inc, based in Louisville, Kentucky, a leading global manufacturer of analytical consumables.

3.4 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, and a workforce of more than 680 people located in the below-pictured regions.



3.5 You can learn more about the Trajan business on our website: www.trajanscimed.com.

Trajan's supply chain

3.6 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.

3.7 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 1,500 suppliers.

- 3.8 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.
- 3.9 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 major supplier in the United States. We also undertake conflict mineral due diligence of our supply chain through use of the Assent platform.
- 3.10 Trajan's top ten largest suppliers by expenditure in the last reporting period were located in the following jurisdictions:
- Switzerland
 - Australia
 - USA
 - Germany
 - Japan
 - Taiwan
- 3.11 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.
- 3.12 Like many businesses Trajan experienced delays in the supply of critical materials, components and devices during the financial year ending June 2022 and we saw numerous delays and cost increases across our supply chain.
- 3.13 Trajan's Malaysian manufacturing site experienced a challenging operating environment in March 2022 due to a reduction in the operational workforce as a significant increase in COVID-19 cases in Penang, particularly the Omicron variant, and the mitigation measures that were implemented by the Malaysian government, including the capped limit of staff attendance at workplaces. In order to ensure we could still deliver the revenue/production volume, the production lines at the Ringwood manufacturing site were temporarily relied on for additional capacity between March to May 2022.

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 centralised manufacturing function.
- 4.2 Recognising that Trajan is at the beginning of developing our modern slavery program, and being committed to identifying and mitigating the risk of modern slavery in our operations and supply chain, we have engaged an external third party to conduct a modern slavery risk assessment on our global procurement function.
- 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 30 as at the date of this statement) indirectly through labour hire organisations in Australia and the United States.
- 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>

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 are reviewing the scope of the procedure in the course of our overall modern slavery risk assessment.

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 this is Trajan's first modern slavery statement and we are at the beginning of planning 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 next reporting period, Trajan will work with its external third-party provider to complete the modern slavery risk assessment in relation to our global procurement operations. As part of this process, we will continue to work closely with our adviser to identify and implement measures within our business to ensure that the risks of modern slavery occurring in our operations and supply chains remains low.
- 6.3 With a commitment to continual improvement, Trajan will also prepare and implement a targeted modern slavery policy over the course of our next reporting period. That modern slavery policy will outline 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.
- 6.4 Looking further, Trajan will invest in educating its leadership and targeted operations teams and business units to recognise the risks of modern slavery in our business and supply chains through the implementation of a training program. The training program will be informed by our modern slavery risk assessment and modern slavery policy.

7 CONSULTATION & CERTIFICATION

- 7.1 In developing our 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: SA Tomisich

Date: 9th December 2022

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 Verwaltungsgesellschaft GmbH
15. Axel Semrau GmbH & Co. KG
16. Trajan Scientific Germany Property GmbH
17. Semrau Immobilien GmbH & Co. KG
18. Semrau Verwaltungs GmbH
19. Trajan Scientific Europe Ltd
20. Trajan Scientific Germany GmbH
21. Scientific Glass Manufacturing (U.K) Ltd