



Tracerco Limited

Modern Slavery and Human Trafficking Statement for the Financial Year 2023/2024

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by Tracerco Limited ("**Tracerco**") during the financial year 2023/2024 to prevent modern slavery and human trafficking in its business and supply chains.

Introduction

We recognise modern slavery and human trafficking as a growing global concern and an important issue for Tracerco, our stakeholders and our customers. In accordance with our company values and upholding the highest ethical standards, we are committed to working to ensure that there is no modern slavery in our business or supply chains.

We operate globally, including in high-risk territories and sectors. During the past year we have continued to progress our efforts to tackle modern slavery and increase accountability. In particular, we have continued to enhance governance and compliance within the group, with the development of our new Code of Ethics (which includes specific commitments in relation to human rights principles and a commitment for employees to speak up if they have concerns regarding unsafe, unethical or unlawful conduct).

Our business

Tracerco is a global leader in nucleonic sciences, enabling more efficient use of natural resources and safer working practices. We have over 60-years of sustained commitment to innovation and technological breakthroughs that improve the function, performance and safety of our customers' processes.

Due to the diverse nature of our products and services, Tracerco has a diverse and range of suppliers of raw materials, manufactured components, goods and services into our business.

Policies

We have a number of policies in place which reinforce our commitment to the elimination of modern slavery and human trafficking within our business and supply chains.

In September 2023, Tracerco transitioned from being a subsidiary of Johnson Matthey PLC to an independent entity following its acquisition by Sullivan Street Partners and Souter Investments. This strategic move necessitated the replacement of Johnson Matthey's systems with solutions tailored to Tracerco's specific operational needs. To facilitate this transition, significant resources were allocated to implement new IT systems and internal policies aimed at enhancing productivity and operational efficiency. These efforts underscore Tracerco's commitment to establishing a robust infrastructure suitable for its independent operations.

During the transitional period following our divestment from Johnson Matthey, Tracerco initially operated under the policies and procedures inherited from our former parent company. Our transition highlighted the need for frameworks tailored to the needs of an independent organisation, we have since invested significant resources into developing a bespoke Code of Ethics that reflects our values and operational priorities. This includes implementing corresponding procedures for supply chain management to ensure transparency and ethical practices. To support this transformation, we have established a dedicated global in-house procurement function for Tracerco, enabling greater oversight, efficiency, and alignment with our ethical commitments. These measures demonstrate our resolve to embed integrity and accountability across our operations.



We have a confidential external "Face Up" service, available to employees and third parties to raise concerns regarding unsafe, unethical or unlawful conduct. This is one of the ways key stakeholders can notify us if they have concerns regarding any slavery or human trafficking in our businesses. The response to all concerns raised in this way is overseen by Tracerco's senior management. In the financial year 2023/2024 there were no human rights grievance reports made against Tracerco.

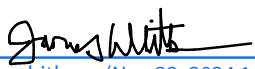
Training

To ensure a consistent understanding of our ethical standards and commitments, Tracerco has introduced comprehensive training programs for both staff and third-party intermediaries (TPIs) through the Kallidus training platform. These programs include specific ethics modules designed to raise awareness of issues such as modern slavery, human rights, and responsible supply chain management. By leveraging Kallidus, we ensure that all relevant stakeholders, regardless of location, have access to high-quality, standardised training materials. This initiative reflects our dedication to fostering a culture of integrity and accountability throughout our global operations.

Our Intent

Tracerco is committed to working to ensure that there is no modern slavery in our business or supply chains. We aim to demonstrate that this is the case by undertaking the steps outlined in this statement, working with our supply chain partners and by continuing to build increasing rigour in our supply chain risk assessment and due diligence processes.

This statement was approved by and signed by James Whitburn, General Counsel & Director on 22/11/2024.


James whitburn (Nov 22, 2024 14:48 GMT)