

Tracerco Limited

Modern Slavery and Human Trafficking Statement for the Financial Year 2024/2025

This statement is made under Section 54 of the Modern Slavery Act 2015 and outlines the steps Tracerco Limited ("**Tracerco**") has taken during the financial year 2024/2025 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. We are committed to working to ensure that there is no modern slavery in our business or supply chains.

Over the past year, we strengthened our approach by embedding the new Code of Ethics throughout the business and reinforcing our commitment to preventing modern slavery and increasing accountability. We focused on ensuring consistent application of our ethical standards across our global operations. We also promoted the use of our confidential reporting mechanisms, encouraging employees and third parties to raise concerns about unsafe, unethical, or unlawful conduct.

Our Business

Tracerco is a global leader in specialist measurement and diagnostic solutions, promoting 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 broad range of suppliers of raw materials, manufactured components, goods and services.

Policies

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

In September 2023, Tracerco became an independent entity following its acquisition by Sullivan Street Partners and Souter Investments, having previously operated as a subsidiary of Johnson Matthey Plc. Since then, we have successfully completed our transition to independence, replacing inherited systems and policies with solutions tailored to Tracerco's operational needs. This included the implementation of new IT systems, internal policies, and a bespoke Code of Ethics aligned with our values and business priorities.

We have also introduced specific procedures for supply chain management to promote transparency and ethical practices. As part of this transformation, we established a dedicated global procurement function to enhance oversight and align our supply chain with our ethical commitments. These measures reflect our ongoing dedication to embedding integrity, accountability, and ethical standards across our global operations.

Our confidential external “Face Up” service remains available to employees and third parties to report concerns about unsafe, unethical, or unlawful conduct. All reports are overseen by senior management. In the financial year 2024/2025, no human rights grievances were reported.

Training

To ensure a consistent understanding of our ethical standards and commitments, Tracerco continues to deliver comprehensive training programmes for both staff and third-party intermediaries through the Kallidus training platform. These programmes include dedicated ethics modules covering topics such as modern slavery, human rights, and responsible supply chain management. By using Kallidus, we ensure that all relevant stakeholders, regardless of location, have access to high-quality, standardised training materials. This ongoing initiative reflects our to fostering a culture of integrity and accountability across our global operations.

Our Intent

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

This statement was approved by and signed by James Whitburn, Global General Counsel & Director:

Signature: 
James Whitburn (Jun 2, 2025 10:23 GMT+1)

Date: 2 June 2025

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Final Audit Report

2025-06-02

Created:	2025-06-02
By:	Dinara Burzhakova (dinara.burzhakova@tracerco.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAARJQHkznEUlo3g6_emhrCEAo2wuelvdhS

"LEG-POL-5 Modern Slavery Statement 2024 2025" History

-  Document created by Dinara Burzhakova (dinara.burzhakova@tracerco.com)
2025-06-02 - 9:07:32 AM GMT
-  Document emailed to James Whitburn (james.whitburn@tracerco.com) for signature
2025-06-02 - 9:07:36 AM GMT
-  Email viewed by James Whitburn (james.whitburn@tracerco.com)
2025-06-02 - 9:22:58 AM GMT
-  Document e-signed by James Whitburn (james.whitburn@tracerco.com)
Signature Date: 2025-06-02 - 9:23:10 AM GMT - Time Source: server
-  Agreement completed.
2025-06-02 - 9:23:10 AM GMT