

Modern Slavery and Supply Chains Statement 2023

Introduction

This Statement is made pursuant to section 54(1) of the United Kingdom Modern Slavery Act 2015 and constitutes TraceLink, Inc's (incorporated in the United States) and its affiliates' (collectively "TraceLink") statement on modern slavery and human trafficking for the calendar year of 2023.

This Statement applies to TraceLink, its subsidiaries and affiliates and sets out the steps taken by TraceLink during 2023 to further build-out its management systems to prevent, identify and address human rights and modern slavery risks in its operations and supply chains.

About TraceLink's Business, Operations and Supply Chain

TraceLink, headquartered in Wilmington, Massachusetts, and operates through companies in the UK, India and Singapore. TraceLink is an industry leader in supply chain management, providing track and trace solutions to meet the regulatory requirements in over 30 countries for the global pharmaceutical industry. TraceLink's Opus Platform uses the data created by multi-enterprise applications to proactively address challenges in regulatory compliance, recalls, and product shortages. For more information about TraceLink, please see the TraceLink website, available at: <https://www.tracelink.com>.

Modern Slavery Risks

TraceLink business model and direct supply chain is in a lower risk category for modern slavery taking into account our business, workforce and the services we provide. TraceLink's employees and workforce are not considered to be vulnerable to slavery, forced labour or human trafficking and TraceLink is committed to fair and safe working practices and complies with the applicable laws and regulations.

Steps Taken to Address Modern Slavery risks

TraceLink has taken the following steps to address risks of modern slavery practices in its operations and supply chains:

- implementing policies and internal governance procedures (see '**Policies and Governance**' below);
- conducting due diligence and risk assessments (see '**Due Diligence and Risk Assessments**' below);
- conducting modern slavery risk-related training (see '**Training**' below); and
- facilitating the reporting of modern slavery risk-related concerns (see '**Reporting and Investigating Concerns**' below).

Policies and Governance

Policies and Controls

We operate the following policies and controls to prevent Modern Slavery within our business and supply chains:

- **Recruitment policy** – we use only specified and reputable employment agencies to source labour and always verify the practices of any new agency before accepting workers from that agency.
- **Whistleblowing policy** – we encourage all members of our staff to report any concerns related to the direct activities, or the supply chains of, our business. Our whistleblowing procedure is designed to encourage and make it easy for members of staff to make disclosures, without fear of retaliation. All disclosures will be fully investigated and appropriate remedial action will be taken.
- **Employee code of conduct** – this code makes clear to employees the actions and behaviour expected of them when representing our business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.
- **Supplier/Procurement code of conduct** – we vet all of our suppliers before we do business with them. We only engage well established and reputable suppliers who share our commitment to acting ethically and with integrity.
- **Staff training** - we provide training to our staff to ensure that they understand and are fully aware of the above policies and controls, including our zero tolerance approach.

Due Diligence and Risk Assessments

TraceLink has various due diligence, risk assessment and risk management procedures in place in its owned operations, and supply chains regularly reviews these procedures.

Supply Chain

- TraceLink oversees a supply chain consisting of vendors, the majority of which are located in the US, providing marketing services, technology products and services, non-tech professional services, human resources, facilities and printing services.
- Suppliers' Risk Assessment – we carry out risk assessments of our Vendors and third-party suppliers including their relative risk to the company and their performance and regard to human rights, labour, ethics, sustainable procurement and environment. We notify the higher risk suppliers of any remediation measures and even terminate our relationship with those who do not implement those measures.
- Supplier Code of Conduct – outlines our minimum requirements for all our third-party providers of goods and services, suppliers, vendors, consultants and contractors. Our standards forbid child labour, forced labour and human trafficking. Suppliers agree to these standards when they sign a Services Agreement or commit to comparable standards by providing their equivalent Code of Conduct and policies.

Training

Employees

- TraceLink is committed to training its workforce on the Supplier Code of Conduct.

Suppliers

- TraceLink works with Suppliers who are committed to training their employees and partners on the Supplier Code of Conduct and relevant policies.

Reporting and Investigating Concerns

- TraceLink did not receive any reports of instances of modern slavery or human trafficking in the financial year ending December 31, 2023.

Assessing the Effectiveness of TraceLink's Actions

We consider that the overall risk of exposure within our business and supply chains to Modern Slavery is low, particularly given: the highly skilled nature of the work undertaken by our staff and suppliers, our industry sector and the jurisdictions in which we do business.

Nonetheless, we acknowledge our responsibility to remain alert to the risks, which are not static, and are committed to ongoing and proactive efforts to ensure that our policies and controls remain effective. We therefore commit to the following initiatives:

- Continue to build upon initiatives to raise awareness levels of our staff;
- Review staff training programmes and levels of staff training;
- Continue to build upon supplier checks, due diligence and auditing processes; and
- Develop key performance indicators to assess the effectiveness of the measures we have taken.

This statement was prepared in coordination with key teams at TraceLink, including procurement, legal, compliance and recruitment.

This Statement was approved by TraceLink's Inc's Board and is effective as of December 2023

Signed by: 

Michael Mozzer
Chief Financial Officer

Date: December 31, 2023