

Modern Slavery Act 2015 Statement



Altera Digital Health, Inc.

Statement on Modern Slavery Act 2015

Introduction

As a healthcare information technology company, Altera Digital Health, Inc., a subsidiary of N. Harris Computer Corporation and part of the Harris Health family of companies, and its affiliates (“Altera”) are committed to improving the lives of people around the world. We adhere to the highest moral and legal principles and fully support all efforts to combat slavery, child labour, and human trafficking. As a result, we have created policies, processes and procedures designed to prevent these unlawful practices in our business and our supply base. The following statement outlines the steps that Altera has taken in support of the UK Modern Slavery Act 2015.

What constitutes slavery today and how does the UK Modern Slavery Act prevent it

Modern slavery is an international crime affecting an estimated 40 million people worldwide. This growing global issue transcends age, gender and ethnicities. It includes victims trafficked from all parts of the world, who are forced illegally to work against their will across many different sectors such as agriculture, hospitality, construction, retail and manufacturing. The Modern Slavery Act 2015 requires commercial organizations supplying goods or services with a turnover of above £36 million to prepare and publish an annual ‘Slavery and Human Trafficking Statement’. The statement must set out the steps an organization has taken, if any, during its fiscal year to ensure that slavery or human trafficking is not taking place in its supply base.

Our organisation’s structure and business

Altera is a leader in healthcare information technology solutions that advance clinical, financial and operational results. Our innovative solutions connect people, places and data. Connectivity empowers caregivers to make better decisions and deliver better care for healthier populations.

Altera is one of the largest public companies focused exclusively on healthcare information technology globally. Altera is divided into a number of business units and offers healthcare providers globally a complete portfolio of clinical, financial, population health management, transaction and managed IT services and other solutions.

As of May 2, 2022, the hospital and large provider practice business unit of Allscripts Health was purchased by N. Harris Computer Corporation and was named Altera Digital Health Inc. Altera operates in 13 countries through local subsidiaries, including Australia, Canada, India, Israel and the United Kingdom.

Our supply-base

Our supply base consists of over 1,000 suppliers across a wide range of business sectors, primarily including, but not limited to, information technology, marketing, consulting, professional services and facilities management. Over eighty percent of our supplier related spend is concentrated within twenty percent or less of our supply base. We hold our suppliers to the same ethical standards that we impose within Altera and are committed to conducting business with suppliers who comply with laws and regulations that are applicable to their business, including laws relating to slavery and human trafficking. Although, the majority of our supply base is in a business sector publicly known to be low risk as it pertains to slave labor and human trafficking, we are committed to end slavery and human trafficking through consistent periodic review of our supply base across many performance metrics including compliance.

Our policies on slavery and human trafficking

Our Code of Conduct requires our employees and representatives to act ethically, with transparency, and to comply with all laws. Our Code of Conduct encourages all employees to report violations of law and provides a variety of channels for doing so. Altera values the help of employees or others who identify potential problems that need to be addressed and prohibits retaliation against any person or entity who honestly raises an issue of concern. In addition to our Code of Conduct, we also maintain Policies directed to specific laws and practices.

Altera's Policy on Slavery and Human Trafficking specifically prohibits slavery, child labour or human trafficking in our business and prohibits us from utilizing any supplier that does not comply with the Modern Slavery Act 2015 or other relevant laws.

Altera periodically assesses the risk of violation of law, including the Modern Slavery Act 2015 and has created a system of controls to effectively manage these risks. Given the types of products and services offered by Altera the risk of violating the Modern Slavery Act is low.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have a formal supplier registration process by which prospective and existing suppliers are reviewed by a cross functional team against many factors, one of which is compliance, and the ability to comply on an ongoing basis. We have now added reviews focused on compliance with the Modern Slavery Act and are in the process of implementing them.

We have or will have in place systems to:

- Identify and assess potential risk areas in our supply base.
- Mitigate the risk of slavery and human trafficking occurring in our supply base.
- Monitor potential risk areas in our supply base.
- Protect whistle blowers.

Supplier adherence to our values and ethics

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply base and contractors comply with our values, we have in place a supply base compliance program. This program consists of a formal supplier registration and review process which is undertaken first upon initiation of a business relationship with a new supplier and periodically thereafter. We also have continuous monitoring of various media outlets and data sources for information pertaining to our supply base. We apply the same rigour to our business partners and resellers, especially as we move into new parts of the globe where we chose to do business.

We have a compliance team, which has representatives from the following departments:

- Legal
- Compliance and Audit
- Procurement
- Human Resources

Awareness and training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply base and our business, we provide annual training to our employees. Our effectiveness in combating slavery and human trafficking is increased through these awareness efforts.

Further steps

Following a review of the effectiveness of the steps we have taken thus far to ensure that there is no slavery or human trafficking in our supply base we intend to continue our commitment to combat slavery and human trafficking through requiring attestation from suppliers that they do not take part in any such activity, as well as, bolstering our continual monitoring of our supply base.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Altera disclosure on slavery and human trafficking statement for 2022-2023.

Louise S. Pearson

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Altera Digital Health, Inc.

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