

Vocera Communications, Inc.
UK Modern Slavery Act/California Transparency in Supply Chains Act
Transparency Statement

The UK Modern Slavery Act 2015 requires that any commercial organization in any sector, which supplies goods or services, carries on a business or part of a business in the UK, and is above a specified total turnover must produce a slavery and human trafficking transparency statement for each financial year of the organization. The transparency statement must include the steps the organization has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business.

The California Transparency in Supply Chains Act of 2010 requires every retail seller and manufacturer doing business in California and having annual worldwide gross receipts above a specified amount to disclose its efforts to eradicate slavery and human trafficking from its direct supply chain for tangible goods offered for sale.

Vocera Communications, Inc. and its subsidiaries (“Vocera,” “we” or “our”) is opposed to all forms of human trafficking, slavery, servitude, forced or compulsory labor and all other trafficking-related activities. We are committed to (i) fully complying with all applicable labor and employment laws, rules and regulations, and (ii) working to eliminate the risk of human trafficking in our business and supply chains. This Transparency Statement is provided to comply with the UK Modern Slavery Act and the California Transparency in Supply Chains Act.

Vocera sells a communications platform focused on healthcare that encompasses software, hardware, and professional services. Vocera engages various contract manufacturers to build specialized products for the hardware components of its communications platform, including manufacturers in Mexico, Taiwan and China. Vocera typically sells directly to its customers, and it ships its products through numerous warehouses around the globe.

Vocera adheres to the Responsible Business Alliance’s Code of Conduct (the “RBA Code of Conduct”), which includes labor standards relating to freely chosen employment, young workers, working hours, wages and benefits, humane treatment, non-discrimination and freedom of association. The RBA Code of Conduct is a valuable tool in addressing modern slavery, as it covers a range of subjects related to slavery and human trafficking, and Vocera’s employees, agents, contractors and consultants are required to adhere to it in the performance of their duties. Vocera does not have specific internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking; however, Vocera’s policies require compliance by its employees, agents, contractors and consultants with (i) the RBA Code of Conduct and (ii) laws, rules and regulations. These policies include reporting procedures and accountability provisions, and provide for protection against retaliation for those making a report. If Vocera becomes aware of a violation of its policies, Vocera will reasonably investigate the matter and take appropriate action, which may include termination. Furthermore, if Vocera becomes aware that laws, rules or regulations have been violated, Vocera will cooperate fully with the appropriate authorities.

Vocera provides ethics training to all employees, which includes an obligation to comply with laws, rules and regulations and report violations of laws, rules and regulations. Vocera did not offer during the 2019 financial year, but is currently in the process of developing, training on human trafficking and slavery (including with respect to mitigating risks within its supply chains of products) for employees and management who have direct responsibility for supply chain management.

Vocera’s relevant policies and training programs provide a means for Vocera to convey to its employees,

agents, contractors and consultants the requirement to comply with applicable laws, rules and regulations.

Vocera's standard supplier agreements obligate suppliers to adhere to applicable laws and regulations, and Vocera's major supplier agreements require compliance with certain standards relating to working conditions. Vocera does not require direct suppliers to certify that materials incorporated into Vocera's products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

Vocera reviews candidate suppliers to, among other things, evaluate supplier compliance with applicable laws, rules and regulations (i) prior to engagement and (ii) at least annually thereafter. The reviews described in the foregoing sentence (i) do not specifically target company standards for trafficking and slavery in supply chains and (ii) are conducted by Vocera and with advance notice, and so are not independent, unannounced reviews. Such reviews do not include, and Vocera does not otherwise conduct, verification of product supply chains to evaluate and address risks of human trafficking and slavery. Vocera also conducts periodic business reviews and at least annually visits supplier facilities. Vocera's standard supplier agreements and supplier review processes (including facility visits) enhance Vocera's ability to assess and manage the risk of slavery and human trafficking in Vocera's supply chain.

SIGNATURE

The Board of Directors of Vocera Communications, Inc. approved this Transparency Statement on February 4, 2020, and Vocera has duly caused this Transparency Statement to be signed on its behalf by the undersigned director.

Vocera Communications, Inc.

Date: February 4, 2020



Brent D. Lang
President and Chief Executive Officer
Member of the Board of Directors