

Modern Slavery and Human Trafficking Statement by TRATON GROUP **(Fiscal year 2024)**

This statement has been prepared pursuant to section 54 of the United Kingdom Modern Slavery Act 2015. In particular, it details the measures implemented throughout the TRATON GROUP, including Scania, MAN, International and Volkswagen Truck & Bus (also referred to hereinafter as “TRATON”) to prevent forms of modern slavery and human trafficking.

At TRATON we respect human rights as a fundamental and general requirement in our operations and business relations throughout the world. We are committed to comply with all relevant regulations in force. We reject all use of slavery, servitude, exploitation, forced, bonded, and compulsory labor, child labor, as well as all forms of modern slavery and human trafficking. Our commitment to respecting human rights is transparently reflected in our Human Rights Policy Statement which inter alia describes which activities we have implemented within TRATON for the protection of human rights.

1. Organization

TRATON GROUP and our four leading brands – Scania, MAN, International and Volkswagen Truck & Bus – are committed to TRATON’s shared purpose of “Transforming Transportation Together. For a sustainable world.” This intention underlines TRATON’s ambition to have a lasting and sustainable impact on the commercial vehicle business and on the Group’s commercial growth.

TRATON was established in times of profound change for our industry — ongoing climate change, the growing importance of sustainability, decarbonization, and digital transformation pose different challenges for TRATON. The TRATON GROUP’s strategy, the TRATON Way Forward, seeks to address these challenges and the resulting expected changes in the transportation and logistics industry. As part of this strategy, TRATON is committed to maintaining sustainable and responsible business operations at all times.

The Group’s portfolio consists of trucks, buses, and light-duty commercial vehicles, as well as the sale of spare parts and customer services. The TRATON GROUP also offers a broad range of financial services to our commercial vehicle customers.

The TRATON GROUP’s business activities are divided into the Industrial Business (TRATON Operations) and Financial Services (TRATON Financial Services) business areas. TRATON GROUP operates 25 production sites worldwide in Europe, North America, Latin America and Africa. TRATON SE is headquartered in Munich, Germany, while TRATON AB is located in Södertälje, Sweden. As of year-end 2024, a total of 109.826 people worked for the Group.

2. Internal measures to prevent modern slavery and human trafficking

COMPLIANCE AND INTEGRITY

Integrity and Compliance are key cornerstones of our entrepreneurial activities. They form the basis for TRATON's reputation, for the trust that our customers and business partners place in us, for the well-being of our employees, and for our long-term commercial success.

Compliance with applicable laws and the Code of Conduct, which covers our guiding principles for acting with integrity, are basic preconditions for the success of our business.

Code of Conduct

The principles in the Code of Conduct are based on TRATON's shared corporate values: Customer First, Elimination of Waste, Respect, Responsibility, and Team Spirit. The Code of Conduct focuses on the integrity and responsibility of each individual. It also uses practical examples to explain how each individual can live up to this responsibility and act with integrity — especially in conflict situations. Integrity means for us to act responsibly and in compliance with laws and ethical values — everywhere and at all times. This applies equally to every single one of us. We do not tolerate infringements of the law. The Code of Conduct is binding for all employees.

Our commitment to respect human rights and freedoms is explicitly addressed in our Code of Conduct.

Qualification of employees

Communication and employee training play a key role in compliance and sustainability work across all hierarchy levels. TRATON conducts regular face-to-face and online training sessions on compliance and integrity topics. A web-based training on the Code of Conduct is rolled out group-wide. Moreover, a group-wide web-based training on Business and Human Rights is rolled out, which includes comprehensive information on Business & Human Rights and is aimed at increasing the awareness of all employees to human rights risks and TRATON's mitigation measures.

Reporting Compliance violations

Potential risks or violations can be reported through [TRATON's whistleblowing channels](#), which are always available to internal and external whistleblowers.

For instance, TRATON's "Speak up!" online whistleblower channel is used to report potential regulatory violations, including possible risks or violations of human rights. It is accessible to all people around the world and enables both employees and third parties, such as business partners and customers, to report suspected misconduct any day of the year in various languages and anonymously if desired.

Our whistleblower system guarantees the highest possible protection for whistleblowers and concerned persons. Discrimination, intimidation or hostility towards the whistleblower, as well as any other reprisals or retaliation against the whistleblower is not tolerated.

Risk analysis in the own business area

At TRATON, human rights have been added to the compliance management system as a focus topic. For the company's own business area, an abstract risk analysis was first carried out. Based on the analysis of external sources such as industry studies and country risk indices, abstract human rights and environmental risks were identified and all relevant companies of the TRATON Group were assigned to one of three risk categories. The subsequent concrete risk analysis included the validation of the identified abstract risks and the determination of concrete risks. Following a risk-based approach, risk workshops as well as questionnaires and individual interviews with topic managers and subject matter experts were used to identify, prioritize and validate specific human rights and environmental risks, addressing, among others, forced labor. In order to deepen its understanding of selected risk areas, TRATON has begun to supplement the risk assessment in its own business area by initiating specific "deep-dive" projects. In addition, preventive measures have been defined to mitigate human rights risks and to support the integration of human rights in the compliance management system.

RESPONSIBILITY FOR PEOPLE

The TRATON Group is more than just a company – we're a global community made up of colleagues from many walks of life. We recognize that everyone is unique, but we all share a common desire for respect and inclusion. That's why we're committed to creating a workplace free of prejudice, discrimination, and intolerance; one where all voices are heard and valued, and everyone feels empowered, in line with the Diversity & Inclusion (D&I) framework, which aims to foster a workplace culture that is welcoming, respectful, and supportive of all individuals.

Diversity and Inclusion

Diversity & Inclusion at TRATON GROUP is our long-term strategic approach to help ensure future success by developing our corporate culture through capturing and supporting the diversity of skills, experience, knowledge, and the perspectives of our most valuable asset – our employees.

We do not discriminate or tolerate discrimination on grounds of ethnic or national origin, sex, gender identity, religion, views, age, disability, sexual orientation, skin color, political views, social background, or any other characteristics protected by law. Going beyond traditional notions of diversity like acceptance or tolerance, D&I actively celebrates our differences and includes all aspects of diversity in our decision making and everyday work.

D&I is sustainably integrated into our everyday business at the TRATON GROUP. It is fundamentally anchored and implemented through a set of strategies and measures across all our brands and adheres to all applicable local laws and regulations. We follow up on the success of our D&I initiatives through regular evaluation. D&I is supported across the company, as reflected in our TRATON Group Diversity & Inclusion Commitment. We strive to develop D&I

practices for our everyday business, inspiring others to make use of all aspects of diversity and inclusion practices along the value chain.

Furthermore, following policies provide guidance for our human resources work around the globe: UN Global Compact, OECD Guidelines for Multinational Enterprises, the TRATON Code of Conduct, the Volkswagen Group Charter on Labor Relations, the Volkswagen Group Charter on Temporary Work and the Conventions of the International Labour Organization.

Employee rights

TRATON recognizes the rights of workers to form and participate in unions and to engage in collective bargaining. The right of workers to collectively bargain the terms and conditions of their work is an internationally recognized human right. At TRATON, the majority of employees throughout the Group are covered by collective bargaining agreements.

3. Responsibility in the Supply Chain

The TRATON approach to managing supplier relationships largely relies on the Responsible Supply Chain System (ReSC System), applicable to the whole Volkswagen Group, which provides standard actions and targets to mitigate significant potential negative impacts and manage any significant risks that arise in relation to workers in the value chain. Additionally, TRATON assesses compliance of suppliers with sustainability requirements of the Code of Conduct for Suppliers and Business Partners through regular due diligence checks.

Standard actions

- Code of Conduct for Suppliers and Business Partners

We respect all regulations in force to protect human rights as a fundamental and general requirement throughout the world. It is a matter of course for us that respecting human rights applies not only to operations within our Company, but also to the behavior of suppliers and other business partners. It is a requirement for our collaboration that they adhere to the same international conventions on human rights as we do. These principles are laid down in our Code of Conduct for Suppliers and Business Partners that form part of our contracts and communication with external partners. Suppliers and Business Partners must take appropriate and adequate measures to eliminate all forms of modern slavery and human trafficking in their own area of responsibility and/or along the supply chain.

- Supply Chain Grievance Mechanism

The Supply Chain Grievance Mechanism (SCGM) is a continuous measure used to process hints on violations of the Code of Conduct for Suppliers and Business Partners by direct or indirect suppliers. The processing of hints in the SCGM up to their closure is uniformly described in a binding process manual and is managed by the Volkswagen Group. As part of the SCGM, necessary, case-specific appropriate actions to eliminate identified violations, depending on the severity and type of the violations, are identified. These actions are intended to

establish an opportunity for value chain workers in the upstream and downstream value chain who are affected by actual negative impacts on working conditions or other work-related rights, including the risk of modern slavery and human trafficking, to be provided with a remedy. The effectiveness of the mechanism and remedial actions is monitored.

Reports about risks or violations related to human rights and environmental obligations or violations of the Code of Conduct for Suppliers and Business Partners by indirect and direct suppliers of the TRATON Group are processed using the Supply Chain Grievance Mechanism.

- Sustainability Rating

The Sustainability Rating (S-Rating) is used to check suppliers' sustainability performance and identify opportunities for continuous improvement. By tying sustainability performance directly to eligibility for being awarded contracts of a certain volume and higher, together with the Volkswagen Group we are aiming to send a signal to our suppliers and partners to encourage collaboration to allow sustainability aspects to permeate the supply chain. The primary objective is not to exclude suppliers from the supply chain, but rather to empower suppliers whose performance is not yet satisfactory to achieve the rating.

- Supplier training for employees in procurement and suppliers

Sustainability is an integral part of the skills profile for employees in procurement. Systematic training of our employees is essential for improving sustainability in the supply chain. In 2024, 363 training courses on sustainability for procurement were performed by the brands worldwide.

To enable continuous supplier development, the TRATON GROUP brands in collaboration with Volkswagen Group conduct topic-specific sustainability training and workshops with suppliers at selected locations or online and offer web-based trainings. In the reporting period, 733 suppliers were trained accordingly. In-depth human rights training has also been available for suppliers since 2023. The training includes legally required aspects such as training on child labor, forced labor, and discrimination. Since 2023, the training has been rolled out to suppliers with a high sustainability risk. Corresponding activities were continued in 2024. In addition to the training courses, through TRATON provides current suppliers with an e-learning module on sustainability in eight languages.

- Raw Material Due Diligence Management System

With regard to the responsible sourcing of raw materials, the Volkswagen Group implements the five steps of the OECD Due Diligence Guidance for Responsible Business Conduct and the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas on an ongoing basis. In 2020, we implemented the RMDDMS based on the OECD guidance. It serves to identify, assess and avoid actual and potential human rights risks, including the risk of modern slavery and human trafficking in the upstream raw material supply chains and to develop and implement mitigation actions. In total, the management system currently covers 18 raw materials. These include the battery raw materials

cobalt, lithium, nickel and graphite, the conflict minerals tin, tungsten, tantalum and gold (3TG), and aluminum, copper, leather, mica, steel, natural rubber, platinum group metals, rare earths, cotton and magnesium. By adopting this risk-based approach, the Volkswagen Group prioritizes its activities on the basis of the severity and likelihood of occurrence of the relevant sustainability risks and the ability of the Company to influence them. In doing so, we consider that sustainability risks may vary between raw materials.

4. Outlook

TRATON is regularly reviewing its human rights due diligence processes for effectiveness and appropriateness, consequently continuously improving its measures to prevent modern slavery and human trafficking. TRATON continues to raise public awareness for Business & Human Rights and accordingly engage with relevant stakeholders; TRATON is for example member of the UN Global Compact.

TRATON SE

Munich, June 2025

Christian Levin

CEO TRATON SE

Darcy Morowitz

Chief Compliance Officer