

## TRATON Policy Statement on Human Rights

### Preamble

We, the TRATON GROUP, are one of the world's leading manufacturers of commercial vehicles together with our brands Scania, MAN, International and Volkswagen Truck & Bus (collectively also referred to as "TRATON", "Group", or "we"). Our product range comprises trucks, buses, and light-duty commercial vehicles. The Group aims to transform transportation — with its products, its services, and as a partner to its customers. Our business operations impact the lives of people every day, within and outside of our Group and throughout the entire value chain. We recognize our corporate responsibility to respect human rights in our own operations and in our business relationships throughout our value chain.

TRATON is committed to comply with applicable national legislation and to respect internationally recognized human rights, as reflected in international human rights law. We acknowledge the International Bill of Human Rights and have joined the UN Global Compact, where we recognize our commitment to its principles regarding human rights and environmental protection. We further strive to operate in line with the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and international labor standards such as the International Labour Organization ("ILO") Declaration on Fundamental Principles and Rights at Work. Furthermore, we acknowledge the following conventions:

- Minamata Convention on Mercury
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal
- Stockholm Convention on Persistent Organic Pollutants ("POPs Convention")

### I. Scope

This Policy Statement on Human Rights (hereinafter referred to as "Policy Statement") outlines our commitment as we move forward as a Group. All TRATON entities stand behind this Policy Statement. Our definition of human rights includes *inter alia* labor rights, as well as environmental aspects that can ultimately affect human rights. We communicate this Policy Statement to our employees via our internal processes, supported by employee trainings and awareness measures, and the [Code of Conduct for Employees](#).

The management of the TRATON entities is responsible for the implementation of the actions and requirements stipulated in this Policy Statement within their respective entities. TRATON recognizes its responsibility to address adverse human rights impacts that it may cause, contribute to, or that may be directly linked to its operations, products, or services through its business relationships throughout the value chain. Therefore, we strive to work with business partners who share these values and the commitment outlined in this Policy Statement. Where there are conflicting local human rights laws or standards, or where state jurisdiction and/or enforcement is weak or deviates from international human rights conventions and standards, we shall seek ways to respect human rights in line with international human rights conventions and standards while complying with local laws.

## II. TRATON Human Rights Management System

We integrate human rights into our compliance management system and respect all regulations in force to protect human rights as a fundamental and general requirement throughout the world. We stress this in our internal regulations and due diligence processes as described below, where we strive to involve relevant stakeholders along the way.

### 1. Anchoring human rights responsibilities

We have defined clear responsibilities in our human rights risk management system within our organization. Moreover, our Human Rights Committee (hereinafter referred to as "HRC") is a multidisciplinary committee, which monitors and tracks the implementation of our human rights due diligence obligations in the Group. Our HRC meets regularly and reports directly to the Executive Board of TRATON SE. Such reports include results of our risk analysis, the effectiveness of our preventive and remedial measures, and relevant findings from our complaints procedure.

### 2. Addressing human rights risks and mitigation measures: own business area

We have integrated human rights into our internal regulations, such as our Code of Conduct for Employees, with human rights as a main chapter in this document, emphasizing the importance of this aspect for us. Our employees are trained on the Code of Conduct for Employees in web-based and face-to-face trainings. Moreover, our employees receive a specific training on business and human rights to provide guidance and raise awareness on our corporate responsibility for this topic. Our employees can address questions on human rights, e.g., via our Compliance Helpdesk, and receive information on human rights through various communication formats. Further, our standardized employment processes and working conditions ensure the protection of labor rights within our organization. In addition to our general preventive measures, we continuously evaluate and implement measures addressing identified risks.

A central element of our human rights management is our risk analysis. We conduct human rights risk assessments in our own operations on a regular basis (as well as *ad hoc* when needed). Based on the analysis of external sources, such as industry studies and country risk indices, abstract human rights and environmental risks are being identified, and all relevant entities of the TRATON GROUP are assigned to one of three risk categories. The subsequent analysis includes 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 subject matter experts are used to identify, prioritize and validate risks. In order to deepen our understanding of selected risk areas, TRATON supplements the risk assessment in its own business area by specific "deep-dive" projects.

Based on the results of our most recent risk assessment, we identified the following risks that are most relevant to our own business area. To promote transparency, we describe these risks on a general gross-risk basis, followed by our commitment to mitigate such risks and reiterate our stand on such topics. This enables us to evaluate and monitor the already implemented measures, and if needed, develop additional measures to mitigate potential remaining net risks.

- **Disregard of occupational health and safety**

With operations at production sites and workshops, general occupational health and safety risks for workers cannot be excluded, e.g., due to the handling of heavy machinery, hazardous chemicals and shift work.

TRATON is committed to its responsibility for the health and safety of its employees and the continuous improvement of their work environment. The adherence to occupational health and safety requirements is coordinated by TRATON SE and handled by the brands' health and safety management systems that are subject to internal and external audits.

- **Disregard of freedom of association**

As TRATON operates globally, we engage in markets where national laws, enforcement practices, and cultural norms regarding freedom of association and collective bargaining differ significantly. These conditions create an elevated risk that our employees may be prevented, discouraged, or otherwise impeded from exercising their right to freely associate or participate in worker representation structures.

Acknowledging the varying global scope of freedom of association, we are committed to upholding its fundamental principles and requirements and aim to ensure a consistent application across all our global operations. As outlined in our Code of Conduct, TRATON conducts constructive and cooperative dialogues with employee representatives, striving for a fair balance of interests.

- **Unequal treatment in employment**

The size, global presence, and the industry-specific environment are factors which contribute to various types of unequal treatment such as harassment, discrimination, and racism.

As a Group, we reject all forms of discrimination, intimidation, harassment, and unwarranted disadvantages. In particular, unequal treatment is prohibited, for example due to ethnic, national, or social origin, skin color, sex, gender identity or expression, sexual orientation, nationality, immigration status, veteran or military status, language, religion or other belief, physical or mental limitations, health status, age, social background, marital status, pregnancy/parenthood, union membership or political views – to the extent that they are based on democratic principles and tolerance of dissent- or any other characteristics protected by law. We respect the freedom of conscience, expression, and religion. Equal opportunities, equal treatment, as well as respectful behavior, are fundamental obligations for our work and collaboration with others. We promote and protect a culture of diversity and inclusion, which has been embedded in our corporate culture and overall strategy. This has been reflected by our Group's diversity & inclusion team, which has been leading group-wide initiatives, e.g., setting a [TRATON GROUP Diversity & Inclusion Commitment](#) and the TRATON GROUP Diversity & Inclusion Strategy.

In addition to the most relevant risks for our own business area, we also consider further risks that may affect our own business area as a result of our global business activities:

- **Environmental Risks**

Our business model, particularly our production sites and workshops, contain an inherent risk of adverse impact to the environment such as harmful contamination of soil, water, and air, e.g., caused by hazardous waste or other substances.

Respecting human rights is our duty for our society and the environment. This means that we not only respect people but also their living environment by reducing pollution of water, air, and soil. We are convinced that our Group's success must be built on responsible and sustainable conduct. We recognize that our products, locations, and services have the potential to impact the environment and the communities in which we operate. We seek to manage natural resources carefully and steadily reduce the adverse environmental impact of our products to comply with environmental protection laws and regulations. TRATON's sustainability board gives strategic direction and defines sustainability focus areas; additionally, it is used as a platform for knowledge transfer within the whole TRATON GROUP.

TRATON recognizes that climate change and other environmental issues can also adversely impact human rights. The TRATON GROUP has environmental compliance management systems to manage and ensure compliance with applicable environmental regulatory requirements. In addition, the Group strives to improve environmental performance and optimize the use of natural resources to mitigate and avoid any risks that might have an impact on human rights.

- **Human right risks in unstable and conflict regions**

Due to our worldwide activities, we operate *inter alia* in countries with significant social, political, or economic instability, so-called conflict-affected and high-risk areas. Such an environment could, in spite of our best efforts, challenge TRATON's commitment to uphold international human rights conventions and standards across the globe. We are aware that business operations in such regions may adversely impact such conflicts or instability, which raises the need to adopt a conflict-sensitive approach to address such impact. Therefore, we developed a heightened human rights due diligence approach in conflict-affected and high-risk areas, which includes conflict analysis and tailored measures to mitigate risks before engaging in business activities.

### **3. Addressing human rights risks and mitigation measures: suppliers**

Respecting human rights applies not only to operations within our Group, but also to the conduct of suppliers and other business partners across our value chain. It is a requirement for our collaboration that they adhere to the same international human rights conventions and standards as we do.

Operational management of sustainability issues, such as human rights in supplier relations, is carried out by sustainability teams within our procurement functions.

The TRATON GROUP assesses supplier risks *inter alia* on the basis of the Volkswagen Group supplier risk analysis. This includes an initial abstract assessment of suppliers, followed by a more concrete risk assessment to identify specific risks, for example by conducting desktop research, reviewing of external reports and articles, and examining internal documentation. The most relevant human rights and

environmental risks that were identified in the context of the initial risk analysis of suppliers are related to the following areas:

- Employment of persons in forced labor and all forms of slavery, as per § 2 (2) Nr.3 and Nr.4 of the German Supply Chain Act,<sup>1</sup>
- Disregarding the occupational health and safety obligations, as per § 2 (2) Nr.5 of the German Supply Chain Act,
- Withholding an adequate living wage, as per § 2 (2) Nr.8 of the German Supply Chain Act,
- Causing any harmful soil change, water pollution, air pollution, harmful noise emission or excessive water consumption, as per § 2 (2) Nr.9 of the German Supply Chain Act.

The TRATON GROUP approach to managing supplier relationships includes preventive actions such as:

### **Code of Conduct for Suppliers and Business Partners**

We have defined core elements of our supplier management in our [Code of Conduct for Suppliers and Business Partners](#). This document sets out our contractually binding expectations for the conduct of suppliers and business partners regarding key human rights-related, environmental, social, and compliance-related standards. Suppliers, as well as business partners of TRATON, are required to commit to the Code of Conduct for Suppliers and Business Partners before we engage in business with them and to address such expectations along their supply chain accordingly.

### **Sustainability Rating**

The Sustainability Rating is an established process across the TRATON GROUP. It is a standardized instrument to assess whether direct suppliers with high sustainability risks and relevant company size comply with Volkswagen's Group sustainability requirements, closely linked to the requirements of our Code of Conduct for Suppliers and Business Partners. The goal is to create transparency, verify compliance within Volkswagen's Group sustainability standards, identify improvement potential, and promote sustainable corporate governance. For certain companies, an audit (on-site inspection) by selected service providers may also be required.

### **Media screening**

The TRATON GROUP carries out continuous and risk-based media screening of relevant suppliers using a software tool. If the tool identifies indications of possible breaches of the Code of Conduct for Suppliers and Business Partners by suppliers in the upstream and downstream value chain, these are reviewed and, if necessary, processed in the Supply Chain Grievance Mechanism.

### **Supplier and employee qualification**

Sustainability is an integral part of the skills profile for procurement employees, embedded in individual competencies and in organizational culture. Training of TRATON's employees is essential for improving sustainability in the supply chain. To enable continuous supplier development, the TRATON GROUP, in collaboration with Volkswagen Group, conducts topic-specific sustainability training and workshops with suppliers at selected locations or online. They also offer web-based training courses, including Sustainability Rating and the Code of Conduct

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<sup>1</sup> Gesetz über die unternehmerischen Sorgfaltspflichten zur Vermeidung von Menschenrechtsverletzungen in Lieferketten vom 16. Juli 2021.

for Suppliers and Business Partners. In addition, in-depth human rights training is provided for high-risk suppliers, covering topics such as child labor, forced labor, and discrimination.

#### **4. TRATON Complaints Procedure and Remedial Measures**

For us, human rights are non-negotiable. TRATON does not tolerate harassment against human rights defenders and acknowledges its responsibility to provide for or cooperate in remediation where it has caused or contributed to a human rights violation. At TRATON, hints regarding potential violations, including violations of human rights, can be reported by employees, business partners, direct and indirect suppliers, customers, and other third parties at any time, and anonymously if desired, to the [TRATON GROUP Complaints Procedure through its various channels](#), e.g., using our "[Speak Up!](#)" [whistleblower portal](#). All reports will be investigated in accordance with the TRATON GROUP Complaints Procedure, and the principles defined in TRATON GROUP's policy on internal investigations, such as the protection of whistleblowers, procedural fairness, confidentiality, and principle of legality.

#### **TRATON GROUP Whistleblower System**

The TRATON Central Investigation Office and Brand Investigation Offices are responsible for processing hints concerning the TRATON GROUP, as well as monitoring and coordinating investigations. The respective Investigation Office confirms the receipt of the hints and aligns with the whistleblowers on additional relevant information, wherever possible and necessary. The respective Investigation Office follows up on every hint and investigates, if deemed necessary, and, where required, recommends necessary remediation measures. If the respective Investigation Office is informed of a potential risk that does not involve TRATON's employees, e.g., potential violations by suppliers, the information will be forwarded to a suitable body or department within TRATON.

#### **Supply Chain Grievance Mechanism**

An important element of our sustainable supply chain management is the Supply Chain Grievance Mechanism. The Supply Chain Grievance Mechanism is used to process hints related to human rights and environmental risks, as well as violations of human rights or environmental obligations, by direct and indirect suppliers as stipulated in our Code of Conduct for Suppliers and Business Partners. The mechanism is available via the TRATON GROUP's whistleblower system and is open to all potentially affected stakeholders.

#### **Remedial measures**

Results of investigations will be reported to the HRC, TRATON SE Executive Board, and other responsible committees, as applicable, that decide on further measures to be implemented.

Our measures and guidelines for human rights are structured to protect all rights holders in the best way possible. When we receive information regarding potential human rights and environmental risks or violations involving our own business area, we investigate immediately and find solutions aiming to prevent or stop such risks or violations, and to mitigate our negative impact. In the event of substantiated knowledge of a violation in our supply chain, we initiate appropriate measures according to the severity of the violation. In the event of serious violations, temporary blocking of suppliers from new awards, or even termination of the business relationship, is possible as a last resort.

## 5. Effectiveness assessment

The HRC monitors the appropriateness and effectiveness of our human rights management system. Within this context, the HRC evaluates whether the TRATON GROUP human rights management system effectively identifies and addresses human rights and environmental-related risks. This includes the review of preventive and remedial measures at least once a year, and on an *ad hoc* basis, if needed. Internal controls, conducted audits and investigations, as well as risk-oriented checks implemented in different risk owner functions, hereby support such effectiveness review.

## 6. Reporting and Documentation

To promote transparency, we document and report our human rights and environmental due diligence efforts as required by applicable legislation. For further information, please refer to our public reports on our website: [Sustainable future of the logistics industry | TRATON](#)

## III. Way forward

In line with our commitment stipulated in this Policy Statement, we continue to develop and improve our human rights due diligence processes. To do so, we particularly consider results of our risk analysis and insights from stakeholder dialogues. Such dialogue formats enable us to identify human rights challenges and continuously enhance the effectiveness of our measures to prevent, mitigate, and remedy our adverse impact.

Munich, March 2026

The Executive Board of TRATON SE and the SE-Works Council of TRATON SE

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