

Modern Slavery and Human Trafficking Statement by TRATON GROUP

(Fiscal year 2025)

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 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 are a participant in the UN Global Compact, committing to its principles. We strive to operate in line with the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization (ILO) standards.

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. We do not tolerate any form of violence, coercion, or other practices that infringe upon an individual's autonomy or dignity.

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 changes expected 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 26 major production sites worldwide in Europe, North America, Latin America, Asia and Africa. TRATON SE is headquartered in Munich, Germany, while TRATON AB is located in Södertälje, Sweden. As of year-end 2025, a total of 107.454 people worked for the Group. Our supply chains include a global network of direct and indirect suppliers providing components, services and raw materials for our products and operations.

2. Prevention of modern slavery and human trafficking

Our measures and guidelines are structured to safeguard the rights of all affected stakeholders and to support a risk-based approach to human rights. We implement measures to identify, prevent, monitor and address human rights risks, including modern slavery.

2.1 Policy Framework

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. TRATON has established a comprehensive policy framework to mitigate the risks of modern slavery and human trafficking across its operations and business relationships.

Human Rights Policy Statement

TRATON's Human Rights Policy Statement defines the Group's commitment to respecting human rights, including the prohibition of forced labor and all forms of modern slavery. It outlines our key principles and responsibilities with regard to human rights, aligned with international standards.

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.

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

Code of Conduct for Suppliers and Business Partners

TRATON requires all suppliers and business partners to adhere to its Code of Conduct for Suppliers and Business Partners, which defines mandatory standards relating to human rights, labor conditions, environmental protection, and ethical conduct. Compliance with the Code of Conduct for Suppliers and Business Partners is a prerequisite for entering into business relationships.

2.2 Risk analysis and due diligence

Our human rights risk management system aims to identify human rights risks, including potential risks of modern slavery and human trafficking on a regular and ad-hoc basis. A central element is our risk analysis, which covers both our own business operations and our supply chain.

Within our own operations, we conduct human rights risk assessments based on the analysis of external sources, such as industry studies and country risk indices. In this process, abstract human rights and environmental risks, including, among others, forced labor, 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.

In its supply chain, 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 in relation to forced labor. This assessment may include desktop research, reviewing of external reports and articles, and examining internal documentation.

In addition, prior to entering into new relationships with third parties, TRATON conducts a due diligence to identify and mitigate risks at an early stage.

2.3 Qualification of employees and suppliers

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 of human rights risks, including modern slavery risks and TRATON's mitigation measures.

In addition, sustainability is an integral part of the skills profile for procurement employees, embedded in individual competencies and in organizational culture. Training of TRATON's procurement 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 topics like the Sustainability Rating and the Code of Conduct 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.

2.4 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.

2.5 Raw Material Due Diligence Management System (RMDDMS)

Regarding the responsible sourcing of raw materials, TRATON as part of the Volkswagen Group RMDDMS follows the approach on the five steps of 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. This management system 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.

2.6 Reporting violations

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

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.

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.

2.7 Effectiveness Review

Our Human Rights Committee is a multidisciplinary committee, which monitors, tracks and reviews the effectiveness of the implementation of our human rights' due diligence obligations in the Group. The Human Rights Committee meets regularly and reports directly to the Executive Board of TRATON SE.

3. 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 of Business & Human Rights and accordingly engages with relevant stakeholders.

TRATON SE

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