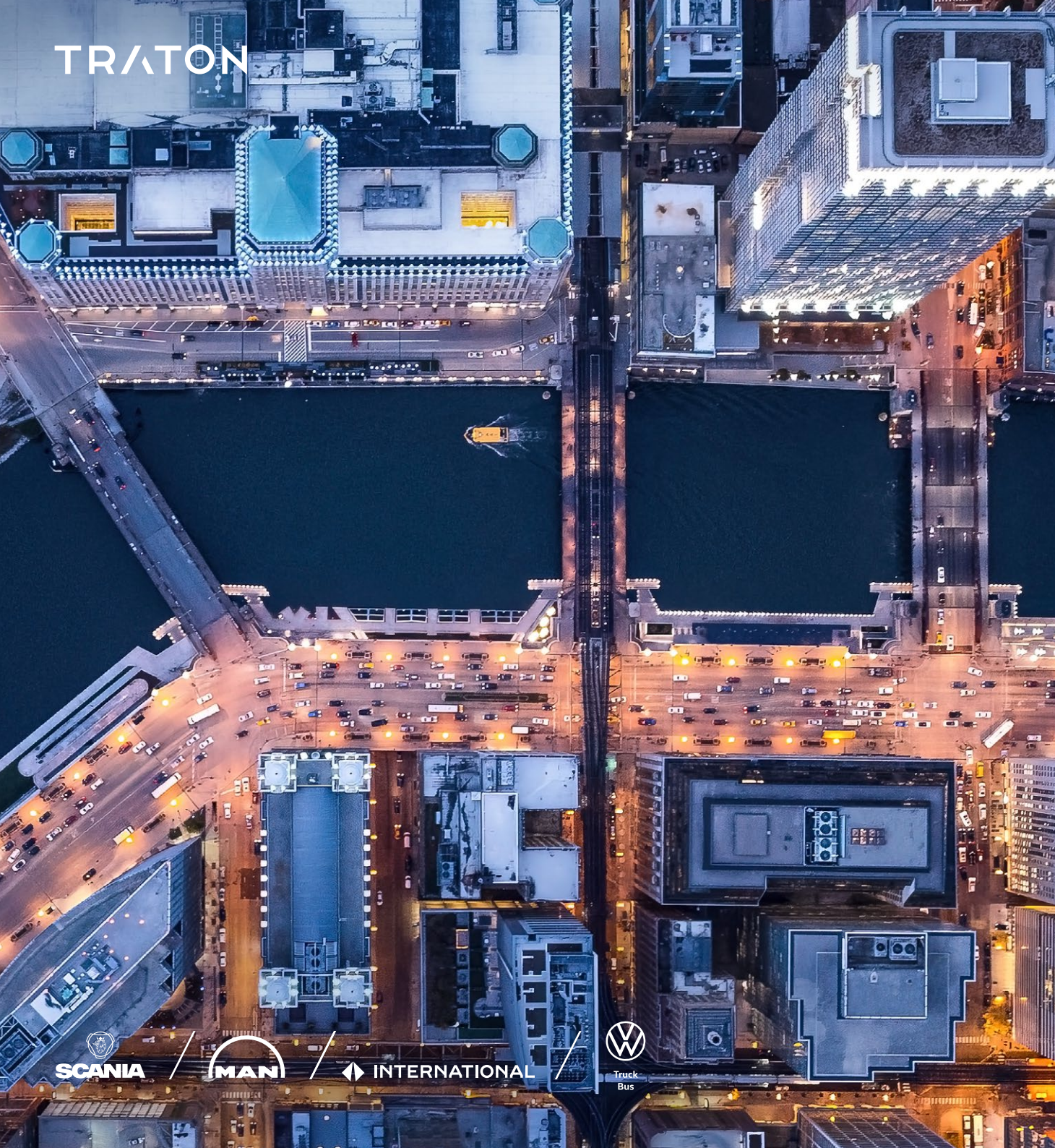


TRATON



2024



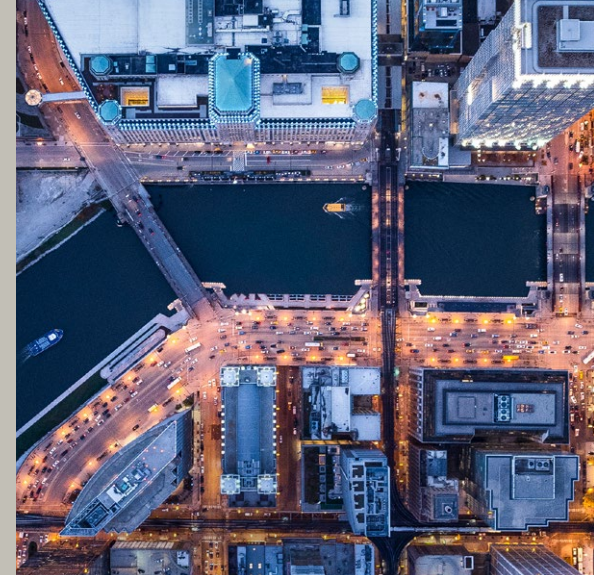
INTERNATIONAL



Tax Transparency
Report

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Chicago, USA



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This report contains forward-looking statements and information on the business development of the TRATON GROUP. These forward-looking statements and information reflect our current views about future events and are based on assumptions relating to the TRATON GROUP’s business and operations and the development of the economies in the countries in which the TRATON GROUP is active. These forward-looking statements may involve risks and uncertainties, and actual results may differ materially from those forward-looking statements and/or any forecasts. This applies in particular, if any of these or other risks or uncertainties materialize, or if the assumptions underlying any of these statements prove incorrect, the actual results may significantly differ from those expressed or implied by such forward-looking statements. Any changes in significant parameters relating to the key markets in which the TRATON GROUP is active, or any significant shifts in exchange rates, market regulation, energy and other commodity prices or the supply with parts relevant to the TRATON GROUP will have a corresponding effect on the business development. In addition, there may also be departures from the expected business development if the factors influencing sustainable value enhancement and the risks and opportunities presented develop in a way other than is currently expected, or if additional risks and opportunities or other factors emerge that affect the development of the business. TRATON SE does not assume any responsibility for updating forward-looking statements in this report, as these are based on our assessment on the day of publication.

This report does not constitute or form part of any offer or invitation to sell or issue, or any solicitation of any offer to purchase or subscribe for, any securities of Volkswagen AG, TRATON SE, or any company of the TRATON GROUP in any jurisdiction.

All figures shown are rounded, so minor discrepancies may arise from addition of these amounts.

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Dear Readers,

Transforming Transportation Together. For a sustainable world. – With this goal, as the TRATON GROUP we are not only reaffirming our efforts to shape the transition to a sustainable transportation world in automotive technology, we also want to live up to our social and tax responsibility. We are taking an important step with this, our first Tax Transparency Report, which we are publishing together with our Annual Report: We aim to report transparently and comprehensively on our financial contributions and our compliance with tax legislation in the countries in which we operate. We describe how the TRATON GROUP views taxes as an integral element of its business strategy. We explain our tax policy, which is based on the principles of compliance with the law, fairness, and transparency. And finally, we give an insight into our tax practices and contributions worldwide. By doing so, we illustrate how we do our fair share to support public finances and promote social prosperity at our locations.

This first TRATON GROUP Tax Transparency Report is an expression of our open and responsible corporate governance. In a world in which expectations of corporate social and environmental responsibility are steadily rising, our aim is to strengthen the trust of our stakeholders through transparency about our tax practices. The focus here is on our production sites, as this is where our tax contribution is greatest, particularly with regard to income and payroll taxes. In this way, we are underlining our responsibility towards the countries in which we operate, as well as at supranational and regional levels.

In light of the future requirements of the social taxonomy, we have decided to publish the report in accordance with Global Reporting Initiative (GRI) Standard 207 as a stand-alone report, so that we not only meet the requirements for tax transparency, but also actively help shape them. Our commitment to transparency and responsible tax practices is also reflected in our efforts to improve our ratings and scores, and to issue green bonds. All members of the TRATON GROUP's Executive Board are very much aware of the importance of taxes. The tone from the top is crucial for fostering a culture of integrity, transparency, and responsibility. This report is a clear indication of our commitment to tax honesty and fairness.

The TRATON GROUP aims not only to be a leader on the journey towards the sustainable transportation of the future, but also to live up to its financial and tax responsibilities.

Sincerely

A handwritten signature in black ink, appearing to read 'M. Jackstein'. The signature is fluid and cursive, with a large, stylized 'J'.

Dr. Michael Jackstein
Member of the Executive Board of TRATON SE,
responsible for Finance and Business Development
as well as Human Resources

TRATON GROUP – WHO WE ARE

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With its four brands Scania, MAN, International (formerly: Navistar), and Volkswagen Truck & Bus, the TRATON GROUP is one of the world's leading manufacturers of commercial vehicles. The portfolio consists of trucks, buses, and light-duty commercial vehicles, as well as the sale of spare parts and customer services. In addition, the TRATON GROUP offers a broad range of financial services to its customers.

The TRATON GROUP's activities are divided into the industrial business (TRATON Operations) and financial services (TRATON Financial Services) business areas. The TRATON Operations business area consists of the four segments Scania Vehicles & Services (brand name: Scania), MAN Truck & Bus (brand name: MAN), International Motors (brand name: International; formerly: Navistar Sales & Services), and Volkswagen Truck & Bus (brand name: Volkswagen Truck & Bus — VWTB).

The four brands of the TRATON GROUP are clearly positioned: Scania is a proud leader in premium transport solutions, specializing in heavy-duty trucks and offering an array of tailored services and applications. Scania empowers business partners and customers to progress through strong and trusted collaboration and a firm commitment to guiding them through the shift to fossil-free transportation. With a global footprint, Scania serves markets across Europe, North and South America, Asia, Africa, and Oceania.

MAN is a strong German heritage brand, operating internationally across Europe, Asia, the Middle East, Africa, and South America. MAN's strength lies in its extensive range of transport solutions, from light commercial options to durable construction vehicles and heavy-duty trucks. What truly sets MAN apart is its unwavering commitment to its customers, constantly striving to optimize their businesses and adapt to the dynamic changes in their requirements.

International's roots in North America date back to the 1800s, when its predecessors pioneered mechanized harvesting. Today, International offers comprehensive mobility solutions for North and South America. Among its key strengths are its vast dealer network, its deep industry expertise, and its exceptionally strong and loyal customer relationships. Formerly known as Navistar, International is now moving into its next chapter under the new overarching brand.

Volkswagen Truck & Bus (VWTB) stands for unparalleled value-for-money solutions. Its core competence is vehicles that are robust, reliable, and efficient – tailored to meet the unique conditions of emerging growth markets and the specialized applications required there. Its strong presence in South America, Mexico, Africa, and Asia underlines its adaptability and commitment to meeting the specific needs of its customers in these dynamic regions.

The primary production sites of Scania (nine locations) and MAN (nine locations) are in Europe. The original plants are in Södertälje, Sweden, and Munich, Germany. International (five sites) produces vehicles in the United States and Mexico. Scania and VWTB trucks and buses are also manufactured in Brazil (two sites). Scania is expanding its presence in China and is currently constructing a production facility in Rugao.

SUSTAINABILITY IN THE TRATON GROUP

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At TRATON, our commitment to sustainability is reflected in our strategy and our corporate values. TRATON's purpose is: Transforming Transportation Together. For a sustainable world. This is a commitment to build a profitable business by developing transport solutions fit for a sustainable society.

The TRATON GROUP's strategy, the TRATON Way Forward, is based on a long-term vision that outlines how TRATON will address the challenges and the expected changes in the transportation and logistics industry. The TRATON Way Forward consists of three pillars, one of which is "Responsible Company". This pillar guides TRATON in its commitment to act in a sustainable and responsible manner. The TRATON GROUP is strongly focused on achieving its environmental ambitions and strengthening sustainable conduct towards people: employees, customers, suppliers, and strategic partners. Responsibility is paramount and should always guide our actions. Together with the brands, TRATON is intensively working on its purpose: "Transforming Transportation Together. For a sustainable world". TRATON's objective is to generate benefit for our customers and society across the entire life cycle of our products.

"Responsible Company" also encompasses a corporate culture that prioritizes people and diversity. At TRATON, diversity extends beyond the traditional understanding, emphasizing the inclusion of individuals with varied experiences, educational backgrounds, and personalities. To uphold responsible conduct, the Company also adheres to ethical principles in corporate governance. The TRATON GROUP intends to become even more responsible as a Company in every respect. Our joint impact areas play a key role in this endeavor. By focusing on these areas, we aim to drive significant positive change and ensure that our actions align with our commitment to responsibility and sustainability.

TAX STRATEGY

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As part of our commitment to sustainable and responsible conduct, we in the TRATON GROUP have developed a comprehensive tax strategy based on the principles of transparency, integrity, and sustainability.

Our aim is not only to fulfill the relevant legal requirements of the primary tax jurisdictions in which the TRATON GROUP operates, we also consider tax fairness and transparency to be an important obligation of our sustainable conduct and our efforts to achieve positive social and environmental impacts.

Our tax strategy is rooted in a strong ethical foundation and an explicit commitment to social responsibility. We firmly believe that companies should play an important role in promoting the public interest and are therefore committed to conducting our tax activities in line with moral standards and principles.

Our Code of Conduct forms the backbone of our tax guidelines and defines the expectations for all employees and business partners. We expect everyone acting on behalf of the TRATON GROUP to behave with integrity and to comply with all applicable tax laws and regulations. We regularly reinforce this as part of our compliance training, which is mandatory for all employees.

We endeavor to ensure the highest level of tax transparency and to disclose our tax strategy, policy, and performance. This includes disclosing information about our tax payments, procedures, and risks in our annual reports and other relevant documents. To do this, we have established clear guidelines and procedures to ensure that all tax decisions and activities are in keeping with our principles and the applicable laws. These include not only our Code of Conduct, but the Group tax guidelines, which are binding throughout the Group in the tax function and for which TRATON SE's Executive Board is responsible, as well as the defined tax strategy.

These guidelines are regularly reviewed and updated to ensure that they reflect changing requirements. Responsibility for ensuring correct implementation lies with the legal representatives, i.e., the members of the Executive Board and managing directors of TRATON SE, its brands, and subsidiaries.

The following objectives provide guidance for the TRATON GROUP's tax strategy:

- Ensuring correct compliance with tax obligations and minimizing tax risks are top priorities. Tax risks are communicated to management, proactively managed, and monitored.
- All relevant tax laws, rules, and regulations are observed, and reporting and disclosure obligations are complied with. All taxes and levies are declared and paid when due.
- Tax planning/structuring must be undertaken responsibly and in accordance with the law. We make active efforts to achieve certainty by obtaining advance rulings.
- Tax positions are supported by corresponding legal opinions.
- Transactions must be structured transparently so that their actual extent is not obscured.
- Inappropriate arrangements that lead to an advantage not allowed by law must be avoided. Tax arrangements and assessments are only implemented if and to the extent that their recognition by the courts and/or according to the relevant local opinion of the tax authorities is demonstrably extremely probable.
- Transactions between Group companies are entered into in accordance with the arm's length principle to the extent this is required for tax purposes.

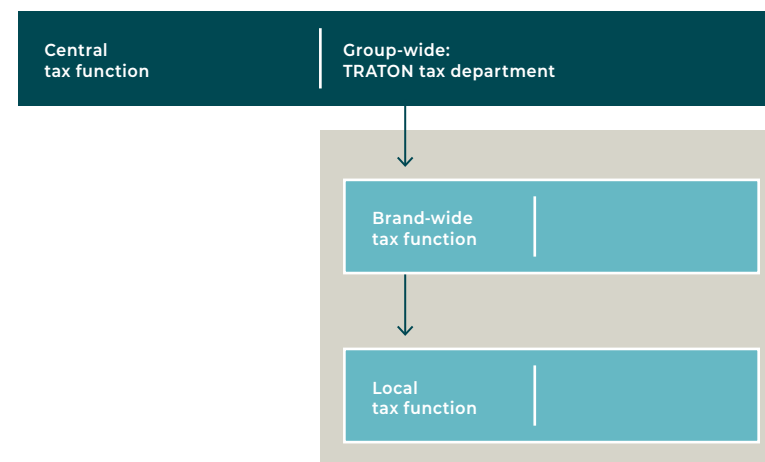
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To ensure that tax issues are managed efficiently, the tax function is divided in line with the TRATON GROUP's organizational structure. The rules of procedure for the tax department describe the organizational structure of the tax department, including responsibility for the various specialist tax areas and tax types, and the roles and responsibilities within the central tax function, as well as the workflows with regard to tax-related processes. The TRATON GROUP's central tax function is primarily responsible for overarching tax compliance management, the effective administration of and compliance with tax regulations (tax governance), and the management of the TRATON GROUP's tax risks.

With their own tax functions, the Scania, MAN, Volkswagen Truck & Bus, and International brands are responsible for the tax issues of the relevant brand and the units assigned to them, and ensure the implementation of Group requirements, while the local tax functions at the units are responsible for the actual accounting for and payment of taxes in accordance with the statutory requirements of the relevant tax jurisdiction and the values of the TRATON GROUP. The TRATON GROUP's external tax advisory services are supported by a global tax provider approach.

The following primary principles are applied:

- Timely, comprehensive fulfillment of all tax obligations
- Creating awareness of tax issues throughout the organization by providing unambiguous information about tax obligations and their potential impact on the business
- Support for the operational business by proactively identifying, addressing, and resolving potential tax issues in close cooperation with all departments/ functions involved
- Being proactive, consistent, and reliable to align and coordinate business needs with tax requirements
- Efficient management of resources and costs



TAX GOVERNANCE, INTERNAL CONTROL SYSTEM, AND RISK MANAGEMENT

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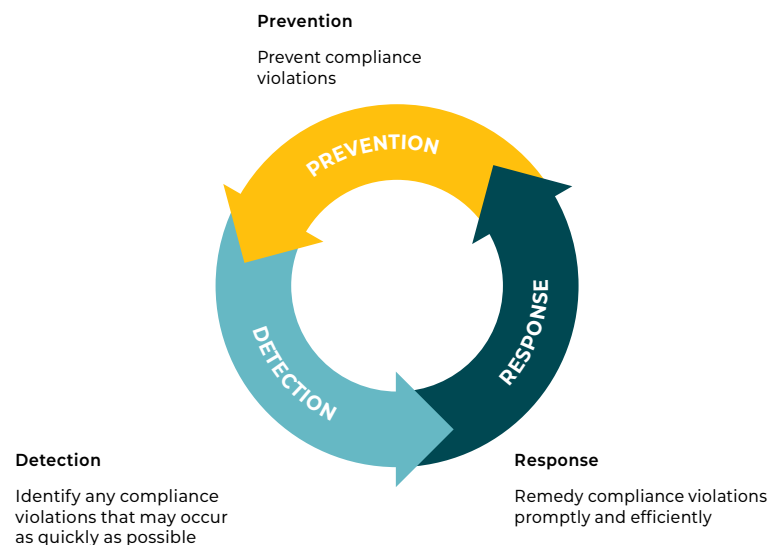
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We have established a comprehensive corporate governance, compliance, and risk management system within the Group to ensure that the interests of all TRATON GROUP stakeholders are adequately reflected, and to guarantee the long-term business performance of the TRATON GROUP. The 2024 Annual Report describes our existing structures, processes, and practices for controlling, managing, and monitoring business activities. The Compliance & Integrity Program introduced within the TRATON GROUP is based on three cornerstones with the aim of preventing compliance violations (prevention), identifying any compliance violations that may occur as quickly as possible (detection), and, as soon as they are discovered, remedying them promptly and efficiently (response).

The key elements of the Compliance & Integrity Program in the TRATON GROUP are, in particular:

- The Code of Conduct as a central guideline for all TRATON GROUP employees for acting with integrity and for minimum ethical standards for suppliers and business partners
- The issuance of compliance guidelines with Company-wide uniform, binding requirements for all employees
- The Compliance Help Desk with advice for all employees about all questions relating to compliance and integrity
- Compliance training courses for continuing education and communication to encourage awareness of integrity among all employees and prevent potential compliance violations
- Integrity audits of business partners in a system-supported approval process for business partners
- Regular compliance risk analysis to identify potential risks in the organization as well as the refinement and improvement of the Group-wide compliance and integrity program, and
- Regular reporting in relevant committees at various brand levels about the status of compliance and integrity measures



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TRATON SE's tax function with its tax risk management and compliance system is fully integrated into the TRATON GROUP's uniform governance and compliance approach. The tax risk management and compliance system is based on three main pillars that operate independently but not in isolation from one another.



As a pillar of the tax risk management system, tax risk reporting focuses on both the existing historical and the foreseeable risks of the TRATON GROUP. These are validated, updated, and reported to the CFO of TRATON SE every quarter.

The second pillar is built on a tool-based process that is used to regularly report the current tax situation of each individual TRATON GROUP company, based on a questionnaire.

The final pillar, tax compliance, focuses on tax-related processes and their functioning and organization so as to mitigate any risks as far as possible.

To do this, the TRATON GROUP has established a tax compliance management system (Tax CMS) in accordance with IDW Auditing Standard (AsS) 980 in conjunction with Auditing Practice Statement (APS) 1/2016. The Tax CMS brings together and describes the uniform principles, measures, guidelines, and standards introduced throughout the Group and defines binding procedures and responsibilities for monitoring and reporting tax requirements and risks, as well as tax compliance violations. The appropriateness and implementation of the Tax CMS was audited by an external auditor and received unqualified validation.

TRATON aligns global tax governance for the Tax CMS with the following seven core elements of AsS 980:

(1) Tax compliance culture

The tax compliance culture embedded in the TRATON GROUP's organization, which is shaped by attitude and conduct – particularly of management and its supervisory bodies (tone from the top) – emphasizes the importance of correct compliance with tax provisions and awareness of compliance with tax obligations at all levels of the organization. The TRATON GROUP adopted the strategic tax principles defined in Volkswagen's Group Policy GP 20 and anchored the corporate principles in the TRATON Group's Code of Conduct. Compliance with tax obligations is set out explicitly and with binding effect for all TRATON GROUP employees in the Group Tax Policy adopted by TRATON SE's Executive Board and its supplementary documents (Group Tax Policy).

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(2) Tax compliance objectives

The tax compliance objectives are derived from the TRATON GROUP's overall corporate objectives and specify these in detail for the tax function. TRATON SE's Executive Board has tasked the central tax function with establishing and maintaining the tax compliance management system to achieve the following objectives:

- Correct compliance with tax obligations in accordance with the relevant laws, guidelines, contracts, and court rulings
- Prevention of losses by implementing and developing a tax risk management system and safeguarding the Company's own tax positions
- Identifying Company-wide opportunities for implementing appropriate tax planning and optimizing tax processes and organization

(3) Tax compliance organization

The Executive Board has delegated responsibility for tax matters for the TRATON GROUP to the tax department. Irrespective of this, responsibility for correct tax compliance remains in each case with the legal representatives of the TRATON GROUP companies. The roles and responsibilities, the organizational structure and workflows, as well as resource planning and representation arrangements for compliance with tax obligations, are clearly and unambiguously defined to ensure tax compliance at all times. For 2024, global tax compliance is also being supported for the first time by the involvement of a single external tax consultant for the entire TRATON GROUP.

(4) Tax compliance risks

Tax compliance risks are identified in the TRATON GROUP with reference to the tax compliance objectives using a systematic risk identification and assessment process that takes into account the probability of occurrence and potential consequences. Risks are identified by means of a multi-stage analytical process:

- Analysis of core and upstream tax processes
- Assessment of the findings from the tax audit and financial statement audit
- Observation and evaluation of changes in internal and external parameters (e.g., change in business model/strategy, expectations of internal stakeholders, changes in legislation, court rulings, etc.)
- Analysis of the tax impact of significant business transactions or changes to the internal organization
- Analysis of special cases

The overall tax situation and the TRATON GROUP's tax compliance principles are also regularly captured and evaluated using uniform, Group-wide, tool-based, and questionnaire-supported processes at the level of both individual companies and the Group. In addition to the tax questionnaire, the brands and TRATON SE report regularly on a consolidated basis for the TRATON GROUP in the Volkswagen Group's Impero tool. The focus here is on monitoring and refining the Tax CMS, which is surveyed and assessed using the master control catalog (MCC). If necessary, follow-up activities are defined with the individual companies or at Group level.

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(5) Tax compliance program

The tax compliance program describes the measures and principles that have been introduced in the TRATON GROUP to counter compliance risks. It also defines what to do if compliance violations are identified. The following measures and principles have been implemented within the TRATON GROUP:

Prevention:

- Clear definition in the TRATON Tax Group Policy of responsibilities and decision-making powers
- Specification of guidelines and technical instructions with regard to tax-relevant matters that are available to all employees on the TRATON GROUP's intranet – "The Tube"
- Provision of checklists to clarify tax matters
- Implementation of regular training courses for employees in upstream tax processes (e.g., purchasing, sales, accounting, marketing, etc.) and the tax department
- Process for the early communication of changes in court rulings or tax legislation, including the resulting relevant measures
- Signature rules in line with the general requirements applicable in the TRATON GROUP
- Use of IT tools for (partial) workflow automation (e.g., Citax, BPOOnline, GTC)

Detection:

- Integrated process controls (e.g., dual control principle)
- Systematic evaluation of data to identify special factors (validations, other reasonableness assessments, system-based sampling concept)
- Organizational and/or technical controls (e.g., automated reasonableness checks in connection with the (partial) automation of processes (e.g., Citax))
- Audits by internal audit

(6) Tax compliance communication

Relevant employees and, where applicable, third parties are informed about the TRATON GROUP's tax compliance program and the roles and responsibilities. This is done in regular training sessions and internal newsletters, for example. There are also rules on how tax compliance risks and information on potential and identified breaches of the rules are reported to the relevant departments within the Company (e.g., responsible employees, legal representatives, tax compliance officer, supervisory body). Potential and identified breaches of rules and the resulting consequences are reviewed in regular interdepartmental meetings and discussions, and the further steps documented. The tax compliance officer documents the identified breaches of rules and the resulting consequences or measures, and tracks their processing and remediation. In addition, the tax compliance officer reports regularly on relevant compliance issues to the head of the tax department and, if necessary, to the supervisory body.

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(7) Tax compliance monitoring and improvement

Ongoing monitoring and assessment of the appropriateness and effectiveness of the implemented Tax CMS is ensured by the tax compliance officer and guaranteed by the activities listed below:

- Regularly planning and implementing control self-assessments and initiating and monitoring measures if findings are made
- Reviewing and updating the Tax CMS process documentation, work instructions, guidelines, and the applicable risk and control matrices
- Monitoring the continuing education and training plan for the Tax CMS
- Defining measures and monitoring the implementation of unresolved issues, working through the tax issue log
- Dialog with Group internal audit and external auditors as part of internal and external audits
- Advising the tax functions and departments on the design and adaptation of controls and/or Tax CMS documentation
- Providing advice on the transfer of the Company's tax obligations to qualified third parties or other operating units
- Contact point for reporting tax-relevant tax compliance violations as part of the Group-wide Tax CMS, as well as assessing the reports and initiating and monitoring corresponding measures

A key component of the TRATON GROUP's Tax CMS in this context is the recurring, system-supported, and hence completely transparent and documented process within the B Wise IT tool. This process monitors all areas of TRATON SE, the brands, and their subsidiaries that are potentially exposed to tax compliance risks. The objective here is to ensure that appropriate measures and controls to mitigate potential tax compliance risks are established and continuously functional. The Executive Boards of TRATON SE and its brands as well as the managing directors of the subsidiaries and their corresponding management teams are responsible for establishing and implementing measures and controls to mitigate tax risks.

As part of the control self-assessments initiated by the tax compliance officer, the management of the TRATON GROUP is regularly required to review, evaluate, and, if necessary, update the identified tax compliance risks and the established risk mitigation measures and controls. In addition to the results of the management self-assessment, the evaluation of the appropriateness and effectiveness of the Tax CMS includes the relevant findings from tax audits, other internal and external audits, as well as tax compliance violations reported via the "SpeakUp!" publicly accessible whistleblower system or the TRATON GROUP's TRATON Investigation Office.

The findings and outcomes identified as part of the Tax CMS process are processed by the tax compliance officer and analyzed and assessed with regard to their risk impact on the respective tax positions. The outcomes and other tax compliance matters are regularly reported to the Head of Tax at TRATON SE.

There is a regular dialog with the Governance, Risk, and Compliance department of TRATON SE to continuously improve the Tax CMS system. New compliance issues and methodologies are discussed and the potential effects on the Tax CMS are identified and incorporated into action plans. In addition, all TRATON GROUP employees are encouraged to submit suggestions and proposals for improvement for an ongoing change and improvement process.

STAKEHOLDER ENGAGEMENT AND MANAGEMENT OF CONCERNS RELATED TO TAX

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Taxes are an essential part of any modern economic system and are core governance mechanisms. At the TRATON GROUP, we are aware of this pivotal role and the importance of appropriate and sustainable taxation in financing government functions and promoting social justice. In light of the high complexity and diversity of tax issues in a globalized business environment, it is all the more imperative for us to integrate the various stakeholders appropriately and ensure the effective management of tax matters.

A key aspect for us is taking into account the interests and needs of various groups affected by tax-related decisions made by the TRATON GROUP, its brands, and subsidiaries:

1. Shareholders

One of the most important stakeholder groups for us when it comes to tax matters are the shareholders of the TRATON GROUP themselves. They have a strong interest in ensuring that the TRATON GROUP's operations are tax-efficient and expect that our Company has developed and implemented a transparent tax strategy aimed at optimizing the tax burden, while complying with laws and regulations.

2. Employees

Our employees are also impacted by tax decisions made by the TRATON GROUP, particularly with regard to remuneration, employee participation programs, or other tax effects of performance incentives. It is important for us to ensure that our employees understand Company-specific decisions that affect their remuneration and financial planning. This is why we inform our employees regularly and support them with various tools for increasing transparency.

3. Customers and suppliers

We maintain an open and cooperative relationship with our customers and suppliers. We analyze the tax impact of management decisions on our customers, such as price adjustments, contractual arrangements, or other business relationships, and communicate them openly where necessary. This helps us to minimize potential problems at an early stage and contributes to strengthening our business relationships in the long term.

4. The public and communities

The public and communities have an interest in the TRATON GROUP fulfilling its tax obligations and making a positive contribution to society. We disclose our tax obligations transparently and are proactively involved in supporting social projects such as SOS Children's Villages. It is important to us to strengthen the Company's image and to cement public trust.

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5. Associations and interest groups

The TRATON GROUP is active in various associations and interest groups. Examples include industry-specific associations such as the Federation of German Industries (BDI), the German Association of the Automotive Industry (VDA), and the European Automobile Manufacturers' Association (ACEA).

TRATON SE's tax department is also active in specialist associations, such as the *Institut für Digitalisierung im Steuerrecht e. V.* (IDSt – Institute for Digitalization in Tax Law). By working in and contributing to associations and interest groups, we share TRATON's views and concerns for a focused political and social dialog, and promote the exchange of information and public debate.

6. Authorities and governments

We work closely with the tax authorities and governments of the countries in which we operate. Through open dialog and constructive cooperation, our intention is to ensure that we fully comply with all applicable tax laws and provisions and mitigate potential tax risks. For example, the early, proactive involvement of the tax authorities in the various tax jurisdictions is an integral part of our Group-wide compliance culture and firmly anchored in our Tax CMS. This not only gives us planning security (e.g., by proactively obtaining advance rulings), but also minimizes our tax risks.

Within the TRATON GROUP, we also voluntarily participate in initiatives of the tax authorities and offer our support. For example, TRATON SE applied to the tax authorities to voluntarily participate in the trials for section 38 of the *Einführungsgesetz zur Abgabenordnung* (EGAO – Introductory Act to the German Tax Code), which was newly created as part of the *DAC7-Umsetzungsgesetz* (DAC7 Implementation Act) enacted by the German Bundestag on November 11, 2022. Section 38 of the EGAO allows alternative audit methods

to be used in tax audits if companies have an effective tax compliance management system. In the future, this will enable tax auditors to grant relief during tax audits on a trial basis. A condition for this is that the effectiveness of the Tax CMS has already been confirmed in the course of an ongoing tax audit and there is therefore no or only an insignificant tax risk. In addition to more efficient tax audit workflows, the aim is to obtain legal validity and certainty for certain tax assessments at an early stage.

As part of the TRATON SE tax function's digitalization strategy, a tool linked to SAP was implemented that enables the following in accordance with TRATON's corporate guidelines:

- Capture of the data required for tax purposes to process complex events and benefits or gifts to employees and business partners
- Automation of the approval workflow (process reliability), and
- Execution of the necessary calculations for the correct processing of the tax burden (posting in the FI and HR system).

Digitalization ensures that the relevant circumstances under section 37b of the *Einkommensteuergesetz* (EStG – German Income Tax Act) and the applicable thresholds can be monitored on the basis of individual recipients, and that substantial risks can be avoided in the context of external tax audits and payroll tax audits.

As a multinational company, it is also our duty to advocate social and economic interests to policymakers in support of a democratic society. TRATON SE's stated aim is to advise political decision-makers with the objective of maintaining or leveraging sustainable, forward-looking opportunities for the Company and its brands. To achieve this, political legislative processes that influence TRATON SE's business model and the transformation of the commercial vehicle industry are tracked critically and constructively.

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In order to create the appropriate underlying conditions, TRATON SE is in constant contact with representatives from the political, academic, media, and business communities, for example through memberships in associations. The TRATON GROUP operates as a serious, authentic dialog partner and a reliable political advisor at national and international level. Innovations are also fostered through open dialog. The TRATON GROUP supports this value chain through regular interaction with external stakeholders as part of its association and committee work.

The TRATON GROUP's representatives act in accordance with the principles of integrity, compliance, openness, and transparency when they represent its interests. All contacts with policymakers are strictly based on the rule of law, internal codes of conduct, and measures to prevent corruption, as well as competition and antitrust law. When dealing with public officials and elected representatives, particular attention is paid to transparency, honesty, and objectivity in communication, as well as collaborative conduct.

COUNTRY-BY-COUNTRY REPORT

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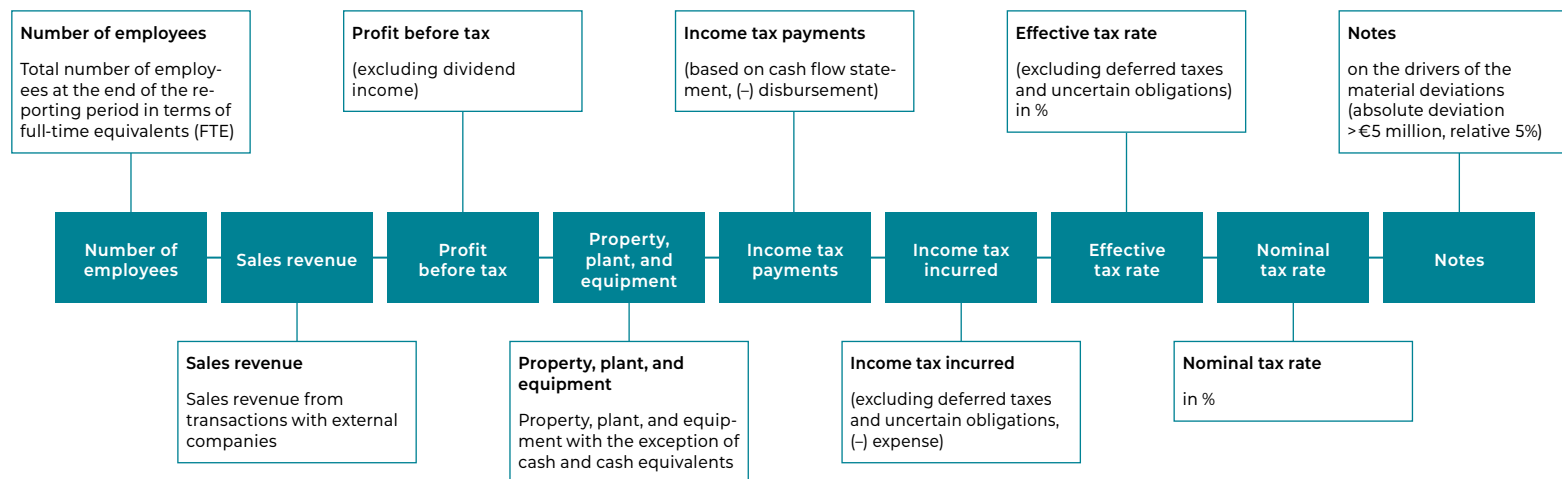
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The following section presents the key tax indicators resulting from the operating activities of the TRATON GROUP in 2024 in tabular form for each country. In addition to the tax contribution, the criteria for selecting countries were that the production sites could be sorted by the number of employees and the sites have an impact on the environmental footprint of the TRATON GROUP. The report has been prepared in euros (€), in line with the functional currency of TRATON SE. Please refer to the Annual Report 2024 for further information on the underlying currency translation and exchange rates. The data is taken from the Group-wide ERP system, which is based on the IFRS Accounting Standards. All amounts are in € million.

The country-by-country report shows the actual taxes to be published in 2024 according to the GRI 207 Report. In particular, deferred tax effects leading to a significant smoothing of the effective tax rate compared to national income tax rates are excluded in accordance with the GRI 207 Report.

Key figures on data collection



Country-by-Country Report

Countries	Number of employees	Sales revenue in € million	Profit before tax in € million	Property, plant and equipment in € million	Income taxes paid/refunded in € million	Income tax incurred in € million	Effective tax rate in %	Nominal tax rate in %	Notes
Sweden	22,570	5,004	-1,859	3,744	-62	-27	-1.4	20.6	a)
Germany	21,239	7,627	51	5,152	6	0	-0.1	31.9	b)
USA	8,513	9,134	2	2,424	-9	-11	659.1	21.0	c)
Brazil	8,458	5,889	119	1,505	-361	-393	329.8	34.0	d)
Mexico	8,032	2,441	439	1,113	-127	-168	38.4	30.0	e)
Poland	6,981	1,920	228	1,227	-33	-34	14.7	19.0	
Türkiye	4,220	352	27	330	0	0	1.0	25.0	f)
Netherlands	3,490	739	134	489	-26	-23	17.0	25.8	g)
France	3,163	2,005	116	954	-43	-37	31.8	25.8	h)
United Kingdom	2,681	2,080	194	1,205	-48	-34	17.3	25.0	i)
China	2,295	168	7	586	-1	-1	22.2	25.0	
Norway	1,550	874	108	611	-19	-22	20.1	22.0	
South Africa	1,477	805	49	587	-25	-14	28.2	27.0	
Austria	1,259	843	64	387	-20	-14	21.7	23.0	
Spain	1,187	2,167	834	610	-28	-63	7.6	25.0	j)
Argentina	1,178	404	30	240	-28	-4	14.3	35.0	k)
Denmark	888	537	44	395	-9	-10	21.7	22.0	
Slovakia	789	188	14	120	-6	-3	24.5	21.0	
Czech Republic	680	500	37	189	-8	-8	22.1	19.0	
Italy	629	1,235	106	344	-37	-33	30.8	27.8	
Switzerland	614	558	53	210	-8	-11	19.9	19.7	
Belgium	602	624	36	239	-8	-9	25.0	25.0	
Finland	590	380	44	161	-7	-7	15.8	20.0	
Australia	565	478	29	234	-14	-12	41.7	30.0	
Peru	530	298	28	99	-10	-8	28.4	29.5	
Others ¹	5,597	4,919	721	1,474	-68	-103	-	-	

1 Countries with 5% of the number of employees in the TRATON GROUP are combined for reasons of materiality.

Notes:

- a) Sweden: tax-free dividend income and impairment losses on shares (single-entity level, excluding consolidation effects), loss at national level, different assessments in financial statements and tax accounts
- b) Germany: tax losses, different assessments in the financial statements and tax accounts based on the *Handelsgesetzbuch* (German Commercial Code — HGB), tax income from previous years
- c) United States of America: tax-free dividend income, different assessments in financial statements and tax accounts, deferred tax assets from exchange rate effects due to IFRS accounting in the functional currency (€), local tax credits and loss carryforwards

- d) Brazil: tax-free dividend income, different assessments in the local financial statements and tax accounts, non-deductible interest and other non-deductible operating costs, other tax-free income, reversal of impairment losses of tax loss carryforwards
- e) Mexico: exchange rate effects due to IFRS accounting in the functional currency (USD), non-deductible operating costs
- f) Türkiye: local tax credits
- g) Netherlands: tax income from previous years
- h) France: different assessments in financial statements and tax accounts, non-deductible operating costs
- i) United Kingdom: other tax-free income and tax income from previous years
- j) Spain: tax-free income from financial instruments
- k) Argentina: tax income from previous years, non-deductible operating costs, different assessments in financial statements and tax accounts

INDEPENDENT AUDITOR'S REPORT

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To the TRATON GROUP, Munich

We have conducted a limited assurance engagement on the Tax Transparency Report of the TRATON GROUP, Munich (the "Company"), for the period from 1 January to 31 December 2024 (the "GRI 207 report" or "income tax information report").

Not subject to our assurance engagement are other references to disclosures made outside the GRI report as well as prior-year disclosures.

Responsibilities of the executive directors

The Company's executive directors are responsible for the preparation of the GRI 207 report in accordance with the reporting principles set out in the Sustainability Reporting Standards of the Global Reporting Initiative, in particular those of GRI 207: Tax 2019 ("reporting criteria").

These responsibilities of the Company's executive directors include the selection and application of appropriate methods for the preparation of the GRI 207 report and making assumptions about the interpretation of individual non-financial disclosures that are reasonable in the circumstances. Furthermore, the executive directors are responsible for such internal control as the executive directors consider necessary to enable the preparation of a GRI 207 report that is free from material misstatement, whether due to fraud (manipulation of the GRI 207 report) or error.

Independence and quality assurance of the auditor's firm

We have complied with the German professional requirements on independence as well as other professional conduct requirements.

Our audit firm applies the national legal requirements and professional pronouncements – in particular the BS WP/vBP ["Berufssatzung für Wirtschaftsprüfer/vereidigte Buchprüfer": Professional Charter for German Public Accountants/German Sworn Auditors] in the exercise of their Profession and the IDW Standard on Quality Management issued by the Institute of Public Auditors in Germany (IDW): Requirements for Quality Management in the

Audit Firm (IDW QMS 1 (09.2022)) and accordingly maintains a comprehensive quality management system that includes documented policies and procedures with regard to compliance with professional ethical requirements, professional standards as well as relevant statutory and other legal requirements.

Responsibilities of the auditor

Our responsibility is to express a limited assurance conclusion on the GRI 207 report based on our assurance engagement.

We conducted our assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised): "Assurance Engagements other than Audits or Reviews of Historical Financial Information" issued by the IAASB. This standard requires that we plan and perform the assurance engagement to obtain limited assurance about whether any matters have come to our attention that cause us to believe that the Company's non-financial reporting is not prepared, in all material respects, in accordance with the reporting criteria. Not subject to our assurance engagement were other references to disclosures made outside the GRI 207 report or prior-year disclosures.

In a limited assurance engagement, the procedures performed are less extensive than in a reasonable assurance engagement, and accordingly, a substantially lower level of assurance is obtained. The selection of the assurance procedures is subject to the professional judgment of the auditor.

In the course of our assurance engagement we have, among other things, performed the following assurance procedures and other activities:

- Obtaining an understanding of the structure of the sustainability organization and stakeholder engagement where relevant to the GRI 207 report
- Inquiries of the relevant employees and those of the tax advisor (WTS) regarding the selection of topics for the GRI 207 report, the impact and risk assessment and the policies of the TRATON GROUP for the topics identified as material

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- Inquiries of the relevant employees and those of the tax advisor (WTS) involved in the preparation of the GRI 207 report about the preparation process, about the internal control system related to this process, and about disclosures in the GRI 207 report
- Inspection of the relevant documentation of the systems and processes that ensure tax compliance
- Identification and assessment of the risk of material misstatement of the GRI 207 report
- Analytical procedures on selected disclosures in the GRI 207 report
- Inquiries, selective testing and obtaining evidence relating to the collection and reporting of selected disclosures in the GRI 207 report
- Reconciliation of selected disclosures with the corresponding data in the annual financial statements and management report
- Evaluation of the presentation of the disclosures in the GRI 207 report.

Assurance conclusion

Based on the assurance procedures performed and the assurance evidence obtained, nothing has come to our attention that causes us to believe that the GRI 207 report of the Company for the period from 1 January to 31 December 2024 has not been prepared, in all material respects, by the executive directors in accordance with the reporting criteria.

We do not express an assurance conclusion on the other references to disclosures made outside the report or prior-year disclosures.

Restriction of use

We draw attention to the fact that the assurance engagement was conducted for the Company's purposes and that the report is intended solely to inform the Company about the result of the assurance engagement. As a result, it may not be suitable for another purpose than the aforementioned. Accordingly, the report is not intended to be used by third parties for making (financial) decisions based on it. Our responsibility is to the Company alone. We do not accept any responsibility to third parties. Our assurance conclusion is not modified in this respect.

General Engagement Terms and Liability

The "General Engagement Terms for Wirtschaftsprüferinnen, Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften [German Public Auditors and Public Audit Firms]" dated 1 January 2024, which are attached to this report, are applicable to this engagement and also govern our relations with third parties in the context of this engagement (ey-idw-aab-en-2024.pdf).

In addition, please refer to the liability provisions contained there in no. 9 and to the exclusion of liability towards third parties. We accept no responsibility, liability or other obligations towards third parties unless we have concluded a written agreement to the contrary with the respective third party or liability cannot effectively be precluded.

We make express reference to the fact that we will not update the report to reflect events or circumstances arising after it was issued, unless required to do so by law. It is the sole responsibility of anyone taking note of the summarized result of our work contained in this report to decide whether and in what way this result is useful or suitable for their purposes and to supplement, verify or update it by means of their own review procedures.

Stuttgart, March 5, 2025

EY GmbH & Co. KG
Wirtschaftsprüfungsgesellschaft
Hinderer Sprengel
Wirtschaftsprüfer
[German Public Auditor]

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