

DAIMLER TRUCK

United Kingdom



MODERN SLAVERY STATEMENT

(2026)

CONTENTS

- Section 1. Introduction 3
- Section 2. Overview of Supply Chain..... 5
- Section 3. Identifying Potential Risks in Our Supply Chains 7
- Section 4. Actions taken to Assess and Address Identified Risks..... 11
- Section 5. How we assess the effectiveness of those actions taken 15
- Section 6. Process of consultation with subsidiary entities in preparing the statement 16
- Section 7. Our strategy for the future..... 17

A message from the MD

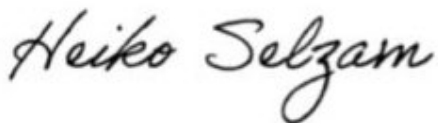
As we present our 2026 Modern Slavery Statement, Daimler Truck UK Limited (“**DTUK**”) reaffirms its commitment to confronting the global issue of Modern Slavery in our operations and supply chains. This report represents our ongoing dedication to transparency and ethical business practices under the *Modern Slavery Act 2015* (the “**Act**”).

DTUK is part of the wider Daimler Truck Group of companies (“**Daimler Truck Group**”); and as part of this, DTUK has locally incorporated and enacted global initiatives that have been implemented by our parent company, Daimler Truck AG (“**Daimler Truck**”). DTUK and the wider Daimler Truck Group of companies recognise that Modern Slavery cannot be eradicated immediately, but we are committed to observing human rights obligations and the general objectives of the Act. We are committed to fostering an environment where ethical standards guide our actions, and where we actively work with our partners to ensure the highest standards of integrity.

To assist us to uphold these values, we set out our standards and expectations with each of our suppliers, including in our Code of Conduct, Business Partner Standards, purchase order terms, tender processes and supplier agreements, which are designed to align with our core values of respect for human dignity and fairness.

DTUK continues to enhance our systems and processes for identifying, mitigating, and reporting Modern Slavery risks, ensuring that these efforts evolve as the challenges and landscape of supply chains change. Our commitment to this cause remains strong, and we will strive to maintain a robust framework that supports accountability, continuous learning, and improvement in this critical area.

This statement was reviewed and approved by DTUK’s Board of Management on 26 May 2026.

A handwritten signature in black ink that reads "Heiko Selzam". The signature is written in a cursive, flowing style.

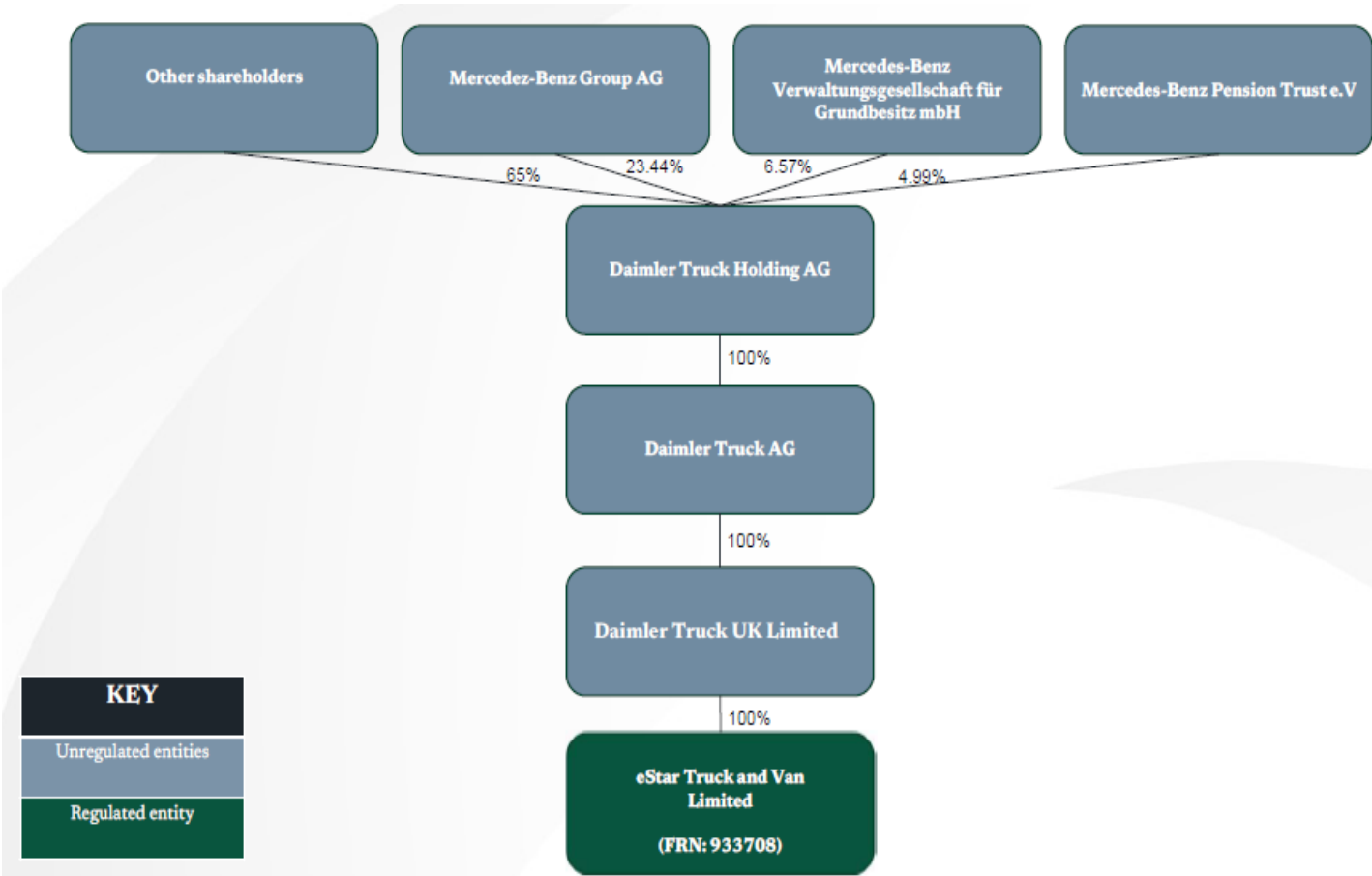
Heiko Selzam Managing Director
Daimler Truck UK Limited

Section 1. Introduction

This Modern Slavery statement is made pursuant to the Act and covers DTUK activities over the financial year 1 January 2025 to 31 December 202. It has been prepared to comply with the requirements of the Act in order to meet the mandatory criteria as outlined in the UK Home Office’s statutory guidance.

DTUK has a rich history in the UK market and has been operating under the current legal entity since 01 December 2021, following a Group restructuring. The company is responsible for importing, distributing and wholesaling component parts and vehicles from Daimler Truck to United Kingdom based businesses and consumers. DTUK is part of the worldwide Daimler Truck Group, with its ultimate parent company being Daimler Truck Holding AG based in Leinfelden-Echterdingen, Germany.

OVERVIEW OF GROUP STRUCTURE



DEFINING MODERN SLAVERY

For the purposes of this statement, the term “**Modern Slavery**” is used to describe the most serious forms of exploitation and encapsulates, including but not limited to:

- **Child slavery** – includes child trafficking, child soldiers, child marriage and child domestic slavery. Child slavery is often confused with child labour. Whilst child labour is harmful for children and hinders their education and development, child slavery occurs when a child is exploited for someone else’s gain.
- **Debt bondage** – occurs when people borrow money they cannot repay and are required to work to pay off the debt. This causes people to lose control over the conditions of both their employment and debt.
- **Descent-based slavery** – occurs when people are born into slavery because their ancestors were captured and enslaved and therefore, they remain in slavery by virtue of descent.
- **Domestic servitude** – when employees work in private homes and are forced or coerced into serving and/or fraudulently convinced that they have no option to leave.
- **Forced and early marriage** – when someone is married against their will and cannot leave the marriage. Child marriages can be considered a form of slavery.
- **Forced labour** – involves any work or services which people are forced to do against their will under the threat of some form of punishment.
- **Human trafficking** – involves transporting, recruiting or harbouring people for the purpose of exploitation, using violence, threats or coercion.
- **Sex trafficking** – involves people, including children, being forced into the commercial sex industry and held against their will by force, fraud or coercion.

As a result of Modern Slavery, there is an estimated...

49.6 MILLION PEOPLE enslaved around the world,
with 2.76 million people in forced labour.

In the United Kingdom there is an estimate of **1.8** living in modern
slavery **per 1,000 people.**

The United Kingdom is rated **14 vulnerability** out of 100.

All above stats are sourced from <https://www.walkfree.org/global-slavery-index/map/>.

Globally, it is Daimler Truck's goal to bring transparency to its supply chains. This presents a great challenge, as transparency cannot be achieved automatically. For this reason, experts from various specialist departments at a global level, such as Procurement & Supplier Quality, Legal & Compliance (includes the Human Rights & Public Law Department within the Legal & Compliance Unit), work closely together to progress the topic from a variety of perspectives. This strategy, both globally and locally, steers us in a positive direction with the aim of minimising human rights violations in our supply chains.

Daimler Truck has a zero-tolerance policy toward forced labor and modern slavery in its own operations throughout its value chain. We enforce this commitment through robust human rights due diligence.

This statement outlines the measures we have taken to strengthen our local policies and procedures to ensure we play our part in the detection and mitigation of Modern Slavery risks within our supply chains.

Section 2. Overview of Supply Chain

DTUK is committed to upholding respect for human rights, which is a central aspect of its sustainable business strategy. DTUK endeavours to ensure these fundamental rights are respected, and measures are implemented to address Modern Slavery both within its own business and throughout its supply chain.

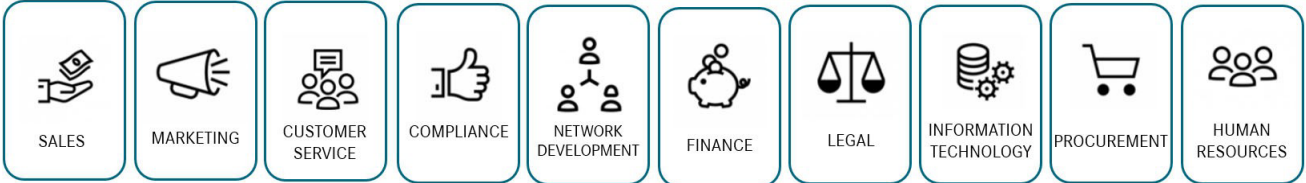
The Daimler Truck Group are the importers, distributors and wholesalers of a range of component parts and vehicles.

Mercedes-Benz Trucks commercial vehicles are distributed through DTUK. These component parts and vehicles are sourced from our key suppliers who are part of the Daimler Truck Group: Daimler Truck AG of Germany.

In 2025, these vehicles and parts were distributed to DTUK's warehouse in Milton Keynes, as well as to 80 dealership locations across the United Kingdom.

OVERVIEW OF OPERATIONS

These suppliers play an essential role in DTUK's internal operations as they help support business units, which include but are not limited to marketing and information technology, government departments, settlement payment dealers (dealers and third-party suppliers) and operating expenses vendors.



These goods and services are sourced through a policy-defined process, where third party suppliers are issued purchase orders typically after a sourcing process.

DTUK DEALERSHIP NETWORK



From an operations perspective, locally DTUK work collectively with suppliers for goods and services located both domestically and overseas.

WORLDWIDE SUPPLY PARTNERS



Section 3. Identifying Potential Risks in Our Supply Chains

Daimler Truck is committed to the responsible sourcing of production and non-production materials and services. We categorically reject child labor, forced labor, modern slavery, and all other forms of human rights violations. Our objective is for suppliers to respect social and environmental standards and thereby support our sustainability efforts relating to human rights and environmental protection.

Risk management for suppliers (Supplier Compliance Due Diligence), including risk analysis, is an integral component of our [Human Rights Compliance Management System \(Human Rights CMS\)](#). The Human Rights CMS provides our systematic framework for fulfilling human rights due diligence obligations and guides our approach to identifying, preventing, and addressing negative human rights and environmental impacts in the value chain.

Within this framework, we apply a comprehensive supplier compliance due diligence approach based on binding requirements, risk screenings, audits, as well as supplier information and qualification measures to increase transparency regarding (potential) negative impacts in the upstream value chain and support compliance with applicable human rights and environmental standards.

As part of our supplier compliance due diligence, direct suppliers are regularly assessed for potential negative human rights impacts in order to identify risks and, where necessary, address them effectively through appropriate measures. In doing so, we are guided by internationally recognized human and workers' rights, as outlined in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. This includes the issues of forced labor and child labor.

Risk identification is conducted in two steps. First, we create an abstract risk profile of our direct suppliers based on various risk indicators, in particular the location of suppliers and the use of critical raw materials or commodities. In a second step, suppliers identified as high risk undergo an in-depth risk analysis using additional assessment tools, especially supplier questionnaires, to identify concrete potential or actual negative impacts. Information obtained through the processing of tip-offs is also taken into account. Where there is substantiated evidence of human rights violations involving indirect suppliers, we carry out ad hoc risk analyses further upstream in the value chain. Based on the findings, appropriate measures are defined to address identified risks or impacts.

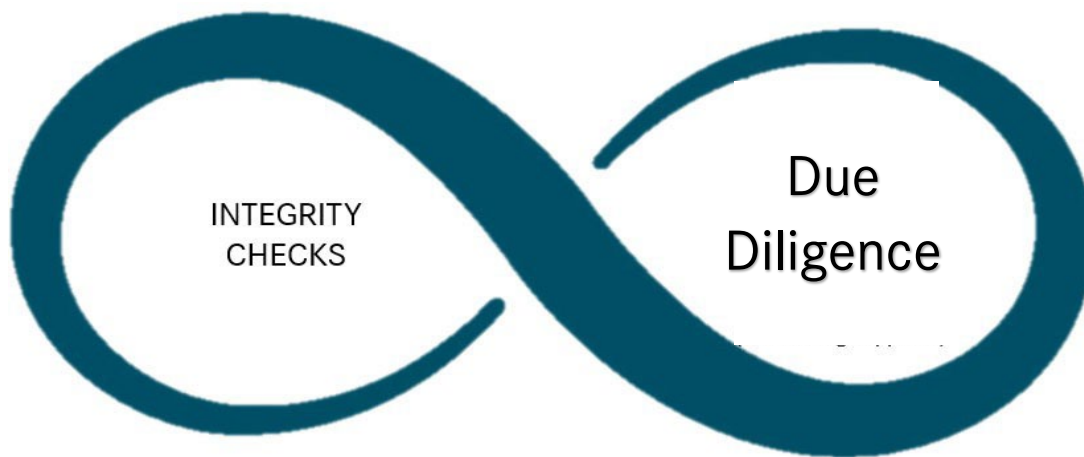
Our approach prioritises preventive measures, including contractual requirements on social responsibility and environmental protection as well as supplier training programs. Where violations are identified, we implement remedial measures by working with suppliers to develop and apply concepts to end and minimize negative impacts. If necessary, additional screening and control measures, particularly audits, are used.

Please see [Daimler Truck website](#) and [Annual Reports](#) for further information.

DTUK has not identified any severe risk of Modern Slavery in our local supply chains thus far. Generally, there is a low risk in our direct product line; however, we consider there to be risks when procuring wider services such as clothing, food, vehicle parts, and electronics.

To understand more about our risk assessment on a group level it can be located [Human Rights in the Supply Chain | Daimler Truck](#) .

Locally, DTUK continually aims to identify potential risks of Modern Slavery within its immediate supply chain. As part of this process, all new suppliers, as well as continuing suppliers, are subject to DTUK's supplier due diligence processes which include the following:



(1) **Integrity Checks**

As a part of our compulsory pre-screening process, DTUK conducts integrity checks on suppliers to ensure they are not listed on any international sanctions lists. If there are any concerns raised by the integrity check, these are escalated to our Legal team, and then to our Board of Management, who will decide on a case-by-case basis, depending on mitigating factors, whether or not to engage with the prospective supplier.

(2) **Vendor Creation Form**

As part of the final step of setting up a supplier in DTUK's systems for payment, the supplier is required to complete the Vendor Creation Form. This form includes Modern Slavery questions, so each new supplier is automatically assessed for any Modern Slavery risks. This assists in identifying any concerns at the earliest stage prior to receiving any products or services.

Globally, Daimler Truck values and is committed to respecting human rights. It has implemented the following initiatives across the Daimler Truck Group: [Human Rights in the Supply Chain | Daimler Truck](#)

(1) **Human Rights Compliance Management System ("HRCMS")**

With our Human Rights CMS, we take a systematic approach to fulfilling human rights due diligence obligations. The Human Rights CMS applies to our Group companies and majority shareholdings as well as to our value chain. It is based on the requirements of applicable laws and internationally recognised standards such as the UN Guiding Principles on Business and Human Rights. Systematic risk analyses to identify adverse human rights impacts, as well as specific measures tailored to prevent and mitigate identified negative impacts, serve to fulfill our human rights due diligence obligations. Supplier due diligence and the handling and processing of tip-offs related to potential human rights violations via our Group wide [whistleblowing system SpeakUp](#) are also an integral part of the Human Rights CMS. Please see [Daimler Truck website](#) and [Annual Reports](#) for further information.

(2) **Human Rights Compliance Training**

This training was sent to all active employees of the administration of Daimler Truck AG and controlled Daimler Truck Group companies in the areas of Purchasing, HR, Communication, Legal & Compliance and the CEOs of the local entities. The training provides information about human rights in general, the possible risks for human rights violations, and the relevance of human rights at Daimler Truck. This online training is sent to the aforementioned target employee group every three (3) years and is mandatory to complete.

(3) **Compliance Awareness Module for Sales Business Partners and Suppliers**

This is a web-based module which was created to explain how Daimler Truck anchors compliance with its partners in everyday business. The module includes content to raise awareness of human rights issues but also covers, among other things, topics such as data compliance, fair competition and corruption prevention. In 2025, the Supplier Welcome Pack was updated to include a reference to the Compliance Awareness Module.

(4) **The Human Rights & Public Law Department**

The Human Rights & Public Law department is responsible for the development and steering of the Human Rights Compliance Management System (**HRCMS**). It is also responsible for providing legal advice on human rights issues within the Daimler Truck Group and works closely with departments that are responsible for the operational implementation of human rights due diligence within the Daimler Truck Group - in particular human resources and purchasing.

(5) **Code of Conduct**

Daimler Truck Group's values and principles are anchored in an overarching Daimler Truck Code of Conduct which provides all Daimler Truck Group employees with guidance how the Group expects all employees to conduct themselves on a daily basis. It also includes information about the Group's commitment to human rights and raises general awareness of the corresponding risks. Web-based training on the Code of Conduct is assigned to all administrative staff every three years, with any new employees automatically assigned the training upon commencement.

(6) **Declaration of Principles on Social Responsibility and Human Rights at Daimler Truck ("Principles")**

To achieve our common goals, we at Daimler Truck, our General Works Council, the World Employee Committee of Daimler Truck and the IndustriALL Global Union have agreed on this Declaration of Principles. It describes our approach and our processes to respect and support human rights at Daimler Truck. The Declaration of Principles which can be found at [Declaration of Principles on Social Responsibility and Human Rights | Daimler Truck](#) supplements our commitment to human rights in our [Daimler Truck Code of Conduct](#) and forms the basis for how we realise our social responsibility.

(7) **UN Global Compact Membership**

We continue to participate in the United Nations (UN) Global Compact and are committed to the UN Guiding Principles for Business and Human Rights. We place particular importance on the International Bill of Human Rights as well as the core labour standards of the International Labor Organization (ILO).

(8) **Business Partner Standards and mandatory contractual clauses on social responsibility and environmental protection**

These standards define the requirements for our business partners regarding respect for human rights. For example, the Group-wide binding clauses on social responsibility and environmental protection define clear standards and requirements for cooperation with suppliers. They also ensure the contractual implementation of the relevant human rights and environmental standards that are expressed in our Business Partner Standards for suppliers. In 2023, these criteria were incorporated into DTUK's local terms applicable to our standard supplier purchase orders. The Business Partner Standards can be accessed via the link [Business Partner Standards](#).

Both locally and globally, there is a continual expansion and improvements to the due diligence processes to respect human rights, and ensure potential risks of Modern Slavery are identified within our supply chains.

Section 4. Actions taken to Assess and Address Identified Risks

DTUK has implemented the following processes, policies and practices to assess and address any potential and identified Modern Slavery risks.

PROCUREMENT

All new suppliers, as well as continuing suppliers, are subject to our due diligence process.

Supplier Welcome Pack

After a supplier passes the compulsory integrity check outlined in Section 3 of this statement, they are issued with a 'Supplier Welcome Pack'. This pack contains information regarding the [Daimler Truck Group's Code of Conduct](#) (further information below), Business Partner Standards (as referenced above), the Compliance Awareness Module (as referenced in Section 3) and our General Purchasing Terms and Conditions.

General Purchasing Terms and Conditions

Supplier engagement is generally governed by our terms and conditions which includes the DTST referenced below.

This document contains a clause requiring the supplier not to engage in Modern Slavery and/or child and forced labour. At the time of publication of this statement, Suppliers are required to warrant that they:

- 1 Will **NOT ENGAGE IN MODERN SLAVERY** in performing the services;
- 2 **DO NOT PROCURE GOODS OR SERVICES** from organisations *that engage in, or are reasonably believed to engage in*, Modern Slavery;
- 3 Will *implement appropriate measures* to **CONTINUOUSLY IDENTIFY, ASSESS AND ADDRESS RISKS** of Modern Slavery in their supply chains; and
- 4 Will **PROMPTLY NOTIFY US** if they become *aware of suspected or actual* Modern Slavery in their supply chains, in which case they will **TAKE ALL REASONABLE STEPS TO PROPERLY ASSESS AND ADDRESS** the actual or suspected Modern Slavery to our reasonable satisfaction; and
- 5 Will place **SIMILAR CONTRACTUAL OBLIGATIONS** on their own suppliers and subcontractors.

Similar warranties are included in our standard form supplier agreement and tender documentation and process to ensure that any new suppliers and relationships align with the [Business Partner Standards](#).

Daimler Truck Special Terms (“DTST”)

Daimler Truck has enshrined the DTST into regular practice across the Daimler Truck Group, whereby they must be implemented by DTUK and form part of our contracts with our suppliers. The DTST define the standards and criteria that Daimler Truck’s suppliers must meet, including the prohibition of child labour and forced labour. The DTST further mandates that a supplier must not employ anyone against their will or force them to work, and that employees must be free to leave their employment with the supplier on provision of reasonable notice. The contractual arrangement makes it possible to legally enforce our expectations towards suppliers if necessary. It serves both to ensure compliance with legal requirements and to promote social and environmental standards along the upstream value chain.

DTST provides DTUK with audit rights to confirm a supplier’s compliance with their Modern Slavery obligations.

Business Partner Integrity Management (BPIM) Process

Daimler Truck is subject to many regulations both legislative and administrative worldwide, therefore the Global Procurement department has established a strict policy to assess suppliers and their associated risks, including human rights related risks. The BPIM supplier due diligence process evaluates suppliers based on key criteria, including country of origin, commodity category, revenue size, and capital structure with an initial risk assessment carried out using an IT system. Where high risk suppliers are identified, a further risk analysis is completed, primarily through use of a supplier questionnaire.

DAIMLER TRUCK GROUP POLICIES & TRAINING

Daimler Truck Code of Conduct

[The Code of Conduct \(“Code”\)](#), was enacted by Daimler AG worldwide in November 2003 and adopted by Daimler Truck from December 2021 following the global restructure of companies and most recently updated in March 2025.

The Code covers all laws and regulations related to our business as well as providing a guideline for corporate principles and behaviour including:

- respect for human rights;
- environmental protection;
- protection of personal data;
- maintaining appropriate relationships with government officials and suppliers;
- protection of company assets; and
- corporate social responsibility.

Whistleblowing Policy

The Whistleblower System was established by Daimler AG in 2006 and adopted by Daimler Truck from December 2021 following the global restructure of companies. More information on the policy can be found using link [Whistleblowing System SpeakUp | Daimler Truck](#).

DTUK has a policy outlining the protections that will be afforded to employees, directors and/or suppliers who report serious wrongdoing at DTUK in accordance with legislative requirements in the UK.

The Whistleblowing Policy supports employees and third parties reporting concerns regarding unethical or illegal conduct, including in relation to Modern Slavery.

Employees may elect to report violations to their manager or HR, or if they wish to remain anonymous, employees and external whistleblowers are able to report via mail, phone or online utilising the SpeakUp whistleblowing platform (“**SpeakUp**”) which can be accessed via the link <https://www.speakupfeedback.eu/web/daimlertruck>.

After receipt of the report, the SpeakUp team conducts an initial risk-based assessment of the potential violation. For all high-risk reports to SpeakUp, an initial legal review of the report is carried out. If the review finds that the suspicions are substantiated, the case is assigned to the appropriate Daimler Truck investigative unit with specific orders to conduct an investigation into and report on the matter.

All staff training on the Code

Every DTUK employee must complete a compulsory e-Learning module on the Code (which includes a Human Rights chapter) once every three (3) years.

In addition, every DTUK employee must sign a confirmation that they will comply with the Code before commencing their employment.

Specialised training for Procurement Team

The ‘front-line’ nature of the work of our procurement team makes them one of the most important layers of protection for DTUK in assessing the risk of Modern Slavery to our business. As such, we recognise the need to educate and empower our team to identify risks or instances of Modern Slavery and take the actions required to assess and/or escalate these findings appropriately.

Our Procurement team has been provided with tailored training on Modern Slavery risk identification and due diligence processes, with new starters in the team also being provided the training upon commencement of employment. The training covers the following:

- an **OVERVIEW OF MODERN SLAVERY** and the forms this can take;
- the **NEW LEGISLATION** and **MANDATORY REPORTING CRITERIA** in Australia;
- a snapshot of our **CORE MANUFACTURER PARENT COMPANY INITIATIVES** in Germany, North America and Japan;
- GENERAL UPDATES** to **internal documents** and **supplier terms**; and
- the **ESCALATION PROCESS** if any Modern Slavery risks are **identified**

The Daimler Truck HRCMS

The HRCMS helps the Daimler Truck Group identify and address systemic risks in our supply chains and potential negative consequences of our business activity on human rights. The HRCMS is part of our group-wide Compliance Management System and consists of seven elements which build on each other as follows:

- Compliance Values
- Compliance Objectives
- Compliance Organisation
- Compliance Risk
- Compliance Program
- Communication and Training
- Monitoring and Improvement

More information on the HRCMS can be found using link [Human Rights Compliance Management System | Daimler Truck](#).

Section 5. How we assess the effectiveness of those actions taken

DTUK and the Daimler Group take a multifaceted approach to mitigating the risks of Modern Slavery within our supply chains. Some of the ways we assess the effectiveness of those actions are outlined below.

HRCMS effectiveness testing

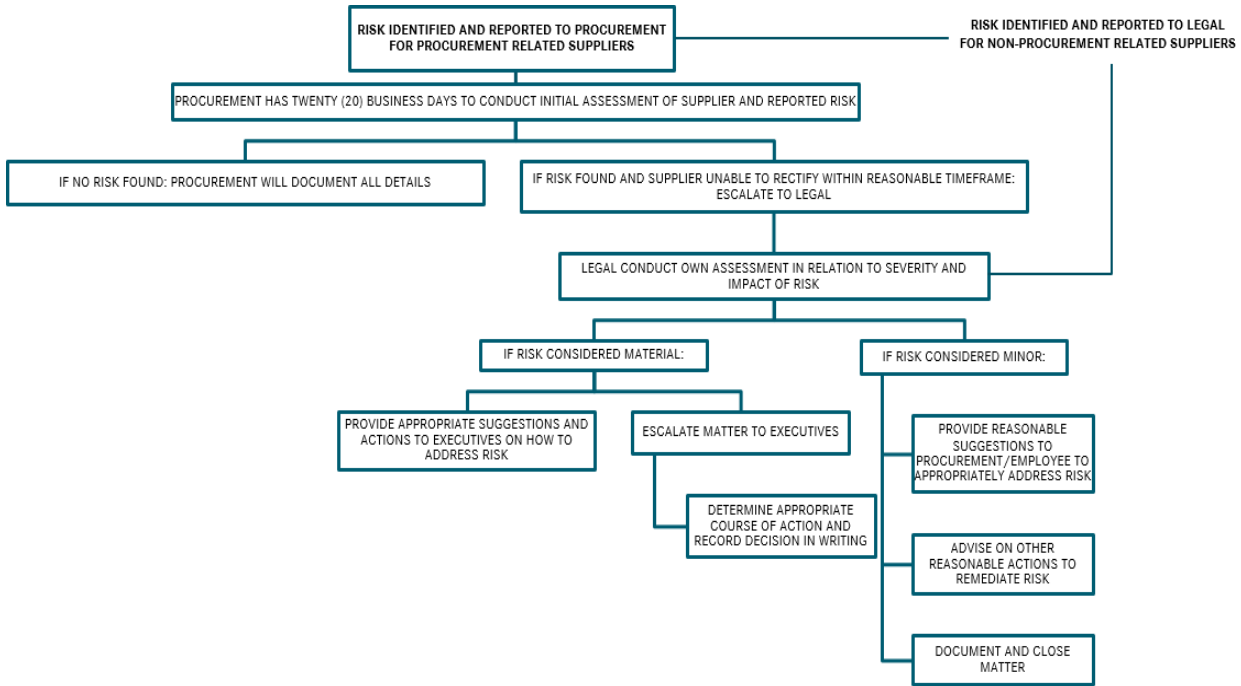
Part of the HRCMS involves effectiveness testing of the human rights measures assigned to entities within the Daimler Truck Group. This effectiveness testing is completed annually across the Daimler Truck Group as part of an Annual Effectiveness Evaluation and measures the adequacy, implementation and effectiveness of the HRCMS.

Modern Slavery Risk Reporting Process

Outside of the HRCMS process, DTUK has implemented a Modern Slavery Risk Reporting process and conducts active and ongoing reviews of every Questionnaire response we receive from a supplier as part of new Vendor creation process.

DTUK is committed to investigating, assessing, and appropriately handling Modern Slavery risks within its business, including any infiltration through its supply chain. Our Modern Slavery Risk Reporting Process has been developed to provide a uniform understanding on what constitutes a Modern Slavery risk and the process for reporting and handling such risks.

At a high level, the process is as follows:



PROCUREMENT AND LEGAL MUST JOINTLY CONDUCT A 'POST-INCIDENT' REVIEW AND ASSESSMENT OF RISK AND EFFECTIVENESS OF THE ACTIONS TAKEN

Section 6. Our strategy for the future

At the time of drafting this Statement, DTUK’s priorities for the 2026 reporting period including initiatives to continuously improve our Modern Slavery due diligence and protocols.

Approved by the Board of Management on 26 May 2026.

Heiko Selzam
Managing Director

Hugo Ramalho
Chief Financial Officer

Richard Skidmore
Customer Service & Parts Director

Stuart Jeggo
Sales & Marketing Director