

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

FOR THE FINANCIAL YEAR ENDING 31st December 2026.

This joint statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and Section 13 of the Australian Modern Slavery Act 2018. It sets out the actions taken by Teletrac Navman and its controlled entities (collectively referred to as "we", "us", or "our") to identify, prevent, and mitigate modern slavery and human trafficking risks within our business operations and global supply chains.

1. ABOUT US: REPORTING ENTITIES, STRUCTURE, AND OPERATIONS

- **Reporting Entities:** This statement covers Teletrac Navman (UK) Ltd (UK Company Number: 2292714) and Navman Wireless Australia Pty Ltd trading as Teletrac Navman Australia (ABN: 50123981457).
 - **Organizational Structure:** We operate as a commercial provider of vehicle telematics, fleet management software, and connected vehicle technology. Our global headquarters is located in Northbrook, IL, USA, with core operational offices based in the UK, Australia, New Zealand and Mexico.
 - **Our Workforce:** We employ approximately 750 people globally. Our workforce consists primarily of highly skilled professionals in software engineering, product development, sales, customer support, and corporate operations, structured as 95% direct employees / 5% contractors.
 - **Nature of Operations:** Our primary business activities include the development of SaaS fleet management platforms, the procurement and distribution of vehicle tracking hardware (IoT devices), and the coordination of device installation services for corporate and commercial vehicle fleets.
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2. OUR GLOBAL SUPPLY CHAINS

Our supply chain is divided between technology hardware procurement and digital infrastructure services required to deploy our telematics solutions.

- **Geographic Footprint:** We source components, finished hardware, and services from 30 suppliers located across 9 countries. Our primary hardware manufacturing and software sourcing countries include the United Kingdom, Australia, United States, Vietnam, China, India, and Malaysia.
- **Key Procurement Categories:** Our supply chain tiers primarily consist of:

- **Telematics Hardware & Components:** Original Equipment Manufacturers (OEMs) and contract electronics manufacturers supplying GPS trackers, OBD dongles, dashcams, sensors, and microchips.
- **Digital Infrastructure & Connectivity:** Cloud hosting providers, data centres, and global mobile network operators (cellular connectivity for IoT devices).
- **Field Installation Services:** Subcontracted auto-electrical engineers and third-party technicians who install telematics hardware into client vehicles across the UK and Australia.
- **Corporate Services:** Facilities management, office cleaning, and recruitment agencies.

3. ASSESSING MODERN SLAVERY RISKS

We recognize that the technology and electronics sectors carry inherent modern slavery risks. During the reporting period, we evaluated our operations and supply chains to categorize specific risk vectors:

- **Operational Risks:** We consider the risk of modern slavery within our direct workforce to be **Low** due to highly regulated local employment laws in both the UK and Australia. A moderate residual risk exists within our network of **subcontracted field installation technicians**, where tracking labour standards across decentralized geographic networks is more complex.
- **Supply Chain Risks:** We have identified our highest-risk areas within our hardware supply chain:
 - **Electronics Manufacturing (Hardware Tier 1 & 2):** The manufacturing of telematics devices and electronic components heavily relies on global supply chains in regions with documented vulnerabilities regarding forced labour, bonded labour, and poor working conditions.
 - **Raw Material Extraction (Deep Supply Chain):** Microchips and batteries used in our IoT hardware require minerals (such as cobalt, lithium, and copper) often extracted in high-risk conflict zones under severe labour exploitation.
 - **Data Centres & Infrastructure:** Subcontracted cleaning and security staff working at the third-party data centres housing our servers face higher risks of exploitative labour practices.

4. OUR POLICIES AND GOVERNANCE FRAMEWORK

We maintain a zero-tolerance approach to modern slavery. Our commitment is operationalized through the following internal policies, which are reviewed annually:

- **Anti-Slavery and Human Trafficking Policy:** Explicitly prohibits forced, bonded, or compulsory labour across all operations and hardware manufacturing agreements.
- **Supplier Code of Conduct:** Mandates that all hardware manufacturers, component suppliers, and installation contractors comply with local labour standards, ethical recruitment practices, and minimum wage laws.
- **Whistleblowing Policy:** Provides a confidential, anonymous mechanism for employees, contractors, and suppliers to report suspected exploitation or ethical breaches without fear of retaliation via the [Speak Up!](#) integrity and compliance program resource.
- **Conflict Minerals Policy:** Outlines our commitment to tracing the origins of raw materials utilized in our telematics hardware to prevent funding exploitation.

5. DUE DILIGENCE AND RISK MITIGATION PROCESSES

To identify and address modern slavery risks inherent to vehicle telematics hardware and software deployment, we execute a risk-based due diligence framework:

- **Supplier Onboarding & Screening:** New electronics manufacturing partners must complete an extensive Modern Slavery Questionnaire detailing factory floor labour practices, worker demographics, and recruitment fee policies.
- **Contractual Protections:** Our standard commercial contracts and hardware manufacturing agreements (HMAs) include explicit clauses requiring compliance with the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018.
- **Technician Network Verification:** Third-party auto-electrical networks providing fleet installations must verify their compliance with local employment, minimum wage, and right-to-work laws in the UK and Australia.

6. REMEDIATION AND GRIEVANCE MECHANISMS

We are committed to providing remediation where we identify that we have caused or contributed to modern slavery impacts.

- **Our Approach:** If modern slavery practices are uncovered at a hardware manufacturing site or installation partner, our primary objective is to protect the victims and mitigate further harm.
 - **Action Plan:** We work collaboratively with the supplier to remediate the issue, utilizing frameworks such as the Anti-Slavery Australia guidelines and UK worker rights organizations. Non-cooperation or failure to systematically eliminate exploitative practices will result in immediate contract termination.
 - **Incidents Reported:** During this financial year, **zero** incidents of modern slavery were reported or identified through our grievance mechanisms.
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7. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We monitor and evaluate the effectiveness of our anti-slavery initiatives using Key Performance Indicators (KPIs). For this reporting period, our performance was as follows:

- **Hardware Supplier Auditing:** 100% of tier-one telematics hardware manufacturers signed and returned our Supplier Code of Conduct.
 - **Supply Chain Transparency:** Map completion achieved for 85% of component suppliers feeding into our core tracking device product line.
 - **Policy Review:** 100% of our core operational policies were reviewed, updated, and approved by executive leadership.
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8. TRAINING AND CAPACITY BUILDING

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, we provide targeted training.

- **Targeted Training:** Dedicated training modules were delivered to teams with direct procurement and hardware sourcing responsibilities, including procurement, engineering, product management, and operations.
 - **General Awareness:** All global staff have access to resources detailing how to spot the signs of human exploitation and how to use internal reporting channels.
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9. CONSULTATION AND APPROVAL

- **Consultation:** The reporting entities covered by this statement operate under a unified global management structure. Executives and directors from both the UK and Australian entities were actively consulted during the risk assessment and

draft review processes to ensure an accurate representation of operational realities.

- **Board Approval:** This statement was formally reviewed and approved by the Board of Directors of the company on **07/07/2026**.

Signed on behalf of the Board of Directors:

Megan Duncan

Director

Navman Wireless Australia Pty Ltd T/A Teletrac Navman Australia

Date: **07/07/2026**

Jonathan Eaves

Director

Teletrac Navman Ltd

Date: **07/07/2026**
