

# DAIMLER TRUCK

## Financial Services



# MODERN SLAVERY STATEMENT

## 2025

*Date: 30 June 2026*

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30 June 2026

### A message from DTFSAu

Daimler Truck Financial Services Australia Pty Ltd ACN 651 056 825 (“DTFSAu”) is pleased to provide our 2025 statement under the *Modern Slavery Act 2018 (Cth)* (“Act”) in recognition of the global concern about Modern Slavery in supply chains.

DTFSAu is an Australian incorporated private entity part of the global Daimler Truck Group of Companies (“Daimler Truck Group”) and as part of this there are various local and global initiatives which assist in identifying, monitoring, managing and reporting Modern Slavery. DTFSAu and the Daimler Truck Group recognise that Modern Slavery cannot be eradicated immediately, but are and remain committed to observing human rights obligations and the general objectives of the Act. DTFSAu continues to take a continuous improvement and enhancement approach to our systems and processes to identifying, monitoring, managing and reporting Modern Slavery. This means we continue to make improvements and enhancements each year and also identify potential future topics that are then reviewed for potential implementation in the future year.

People first is one of our core convictions. We aim to ensure that fundamental human rights are respected in our own business as well as by our authorised dealerships and our suppliers.

This statement has been approved by the DTFSAu Board of Management being the principal governing body of DTFSAu.



Craig Cubitt  
Managing Director & CEO  
Daimler Truck Financial Services Australia Pty Ltd

## Section 1. Introduction

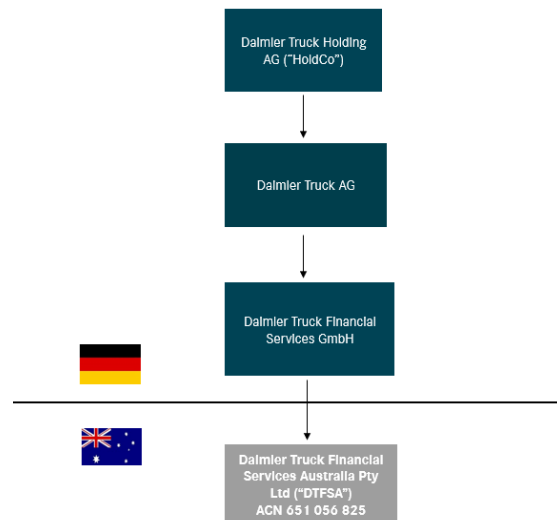
This Modern Slavery statement covers DTFSAu’s activities over the reporting period of 1 January 2025 to 31 December 2025 and also outlines some of our priorities for the future. It has been prepared in accordance with the mandatory reporting criteria set out in the Act and the guidance issued by the Australian Border Force under the publication *Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities*.

DTFSAu has been operating in the Australian market since December 2021 and went live in the New Zealand market in October 2025. DTFSAu is a captive commercial finance company and provides a range of commercial finance products primarily relating to commercial vehicles. Our customers include dealer/wholesale, corporate fleets and retail customers.

DTFSAu is an Australian incorporated private entity part of the worldwide Daimler Truck Group, with its ultimate parent company being Daimler Truck Holding AG based in Leinfelden-Echterdingen, Germany and listed on the German stock exchange. Daimler Truck Australia Pacific Pty Ltd (“DTAuP”) is also an Australian incorporated private entity and is part of the worldwide Daimler Truck Group and issues its own separate Modern Slavery statement.

An overview of our corporate structure is available below. In relation to mandatory reporting criteria 6 and as noted under section 6 of this Modern Slavery Statement, DTFSAu does not own or control any other entities other than DTFSAu and therefore this criterion is not applicable.

### OVERVIEW OF STRUCTURE



### DTFSAu EMPLOYEE OVERVIEW IN AUSTRALIA

Location	Number of employees
Mulgrave Head Office	64 (As of 31.12.2025)

## 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 the 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 are an estimated...

**49.6 MILLION PEOPLE** enslaved **around the world**,  
with 27.6 million people in forced labour.<sup>1</sup>

In the 2024-25 financial year, the Australian Federal Police received ...

**420 reports** of modern slavery and human trafficking in Australia.  
An increase of **38 reports** compared to the prior financial year.<sup>2</sup>

<sup>1</sup> Information sourced from <https://www.walkfree.org/projects/global-estimates-of-modern-slavery/>, on 9 January 2026.

<sup>2</sup> Based on AFP report dated 30 July 2024, available at: <https://afp.gov.au/news-centre/media-release/world-day-against-trafficking-persons-12-cent-increase-reports-human> and <https://www.facebook.com/AusFedPolice/posts/reports-of-human-trafficking-to-the-afp-have-nearly-doubled-during-the-past-five/1310556081110713/>, sourced on 9 January 2026.

Globally, it is Daimler Truck's goal to enhance 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 Centre of Competence for Human Rights), 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.

This statement outlines the measures we have taken in 2025 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

DTFSAu is committed to upholding respect for human rights. DTFSAu 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.

As outlined earlier, DTFSAu is a captive commercial finance company and offers commercial financing and leasing solutions and ancillary solutions to commercial customers (dealer/wholesale, corporate fleet and retail customers) in Australia and New Zealand. DTFSAu uses an authorised dealership model whereby each authorised dealership must have at least one Daimler Truck franchise and relevant agreements are signed by our authorised dealerships.

DTFSAu sources goods and services from suppliers located both domestically and overseas. DTFSAu follows the Daimler Truck global procurement policy when sourcing goods and services.

These suppliers play an essential role to DTFSAu internal operations as they help support the relevant business units to deliver our product offering. Examples of some of the suppliers we use (but not limited to) include: information technology providers, marketing agencies, mercantile agents, credit reporting agencies, government departments etc.

### OVERVIEW OF OPERATIONS - DTFSAU BUSINESS UNITS



### Section 3. Identifying Potential Risks in Our Supply Chains

To date, DTFSAu has not identified any severe risk of Modern Slavery in our local supply chains. Generally, there is a low risk in relation to our direct products offered (given that DTFSAu is a captive commercial finance company and offer various commercial financing, leasing and ancillary solutions). However, there could be risks in relation to procurement use of wider goods such as clothing, food, and electronics. Generally, DTFSAu does not engage in a large scale of procurement and most of its suppliers are longer standing who we have ongoing relationships and agreements with.

Below is a snapshot of some potential risks we consider may be associated to our broader supply chain:

Risk	Description
Raw materials	Range of raw materials for example in relation to clothing which may have a heightened risk of Modern Slavery, such as child labour and debt bondage.
Lack of visibility	We recognise we have decreased visibility over contracted and subcontracted labour and third-party manufacturing, which increases the risk of Modern Slavery, such as forced labour.
Labour exploitation	Although not direct risks, we are aware and recognise the risks of labour exploitation in various sectors e.g. clothing sector.

Locally, DTFSAu continually aims to identify potential risks of Modern Slavery within its immediate supply chain. As part of this process, DTFSAu’s suppliers go through various due diligence processes, outlined below:



#### (1) Integrity Checks

As part of our compulsory pre-screening process, DTFSAu conducts integrity checks on prospective suppliers through the Daimler Truck global supplier creation system. This process includes screening against applicable international sanctions lists and other relevant compliance and risk databases. The system incorporates automated controls that prevent the creation of a supplier profile where the required screening criteria are not satisfied, and triggers enhanced due diligence where the initial risk assessment identifies potential concerns.

(2) Vendor Creation Form for New Suppliers

Suppliers must complete a Vendor Creation Form before they can be established in DTFSAu's payment systems. The form incorporates a Modern Slavery Supplier Questionnaire which forms part of DTFSAu's mandatory pre-screening process to identify any potential modern slavery risks prior to engagement and ensures all new suppliers established in our internal systems are captured and assessed.

(3) Annual Modern Slavery Supplier Questionnaire for Active Suppliers

DTFSAu requests its active suppliers to complete the Modern Slavery Supplier Questionnaire ("**Questionnaire**") annually to ensure DTFSAu are continually able to identify and assess potential Modern Slavery risks within its supply chain.

The Questionnaire asks a variety of questions including whether the supplier is required to submit a Modern Slavery Statement, whether the supplier is aware of any general or specific modern slavery risks in its operations or supply chains and any actions taken to address such risks. All responses are reviewed by the Legal team. If needed the Legal team can escalate any supplier responses for discussion with the Local Compliance Officer and/or the Internal Controls Committee for consideration of next steps e.g. whether further questions should be raised with the supplier, further steps taken or whether engagement with the supplier can continue.

In 2025, DTFSAu sent the Questionnaire to a total of 200 active suppliers. There were a total of 23 responses which were reviewed by the Legal team. There were no substantive concerns arising and there was no need for further escalation from the Legal team. Suppliers shared some of the measures they have in place, for example having their own modern slavery policies and reporting channels; using only Australian suppliers, contractual compliance clauses, training; supplier codes of conduct and supplier vetting processes (including risk classification of suppliers), active monitoring or auditing of supply chains where needed etc. There were no suppliers that shared that they were aware of any specific modern slavery risks.

DTFSAu has sent a supplier questionnaire annually between 2022 and 2025. It is currently exploring other approaches for 2026 to make it more user-friendly to complete and see if this will also increase response rates of our suppliers.

(4) Internal Controls Committee

DTFSAu's Internal Controls Committee is the relevant body that looks at a wide variety of risk, governance and compliance topics and includes all of DTFSAu Executive Committee (which includes all directors of DTFSAu), the Local Compliance Officer for DTFSAu as well as various members of management. Modern Slavery has a formal standing as a regular topic of discussion in the regular meetings alongside other compliance, governance and risk topics.

## (5) Industry Comparison

In 2025, DTFSAu monitored and reviewed modern slavery statements within the industry to identify any gaps and areas in our current processes that may need adaptation or improvement.

Globally, Daimler Truck values and is committed to respect for human rights. Below are a number of initiatives that have been implemented across the Daimler Truck Group:

### (1) Human Rights Compliance Management System (“Human Rights CMS”)

Daimler Truck rely on a systematic approach to fulfill human rights due diligence obligations through its Human Rights CMS. This system applies to all Daimler Truck Group companies, majority shareholdings and its value chains. It is based on requirements of applicable laws and internationally recognised standards such as the UN Guiding Principles on Business and Human Rights, the International Labour Organisation (ILO) core labour standards, the Organisation for Economic Co-operation and Development (OECD) Guidelines for multinational enterprises and regulatory requirements, such as e.g. the German Supply Chain Due Diligence Act. 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 the Group wide [whistleblowing system SpeakUp](#) are also an integral part of the Human Rights CMS. For more information on the Human Rights CMS, please refer to the [Daimler Truck global website](#) and [Annual Reports](#).

### (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, and Legal & Compliance (e.g. Legal & Compliance Officers (LCOs)), and the CEOs of the local entities. In addition, in 2024, DTFSAu selected a number of further local managers to complete the training including Finance and IT. 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 target employee group every three (3) years and is mandatory to complete within sixty (60) days of receipt.

### (3) Compliance Awareness modules

- *DTFSAu staff* - Web-based compulsory modules are issued to DTFSAu staff as part of annual training requirements and aim to develop awareness about various compliance relevant topics such as data compliance, fair competition and consumer protection, and anti-bribery, fraud and corruption prevention.
- *Authorised business managers at dealerships* - Web-based compulsory modules are issued by DTFSAu to the authorised business managers at dealerships as part of initial onboarding and then annual training/accreditation requirements which aim to develop awareness about various compliance relevant topics such as data compliance, fair competition and consumer protection, and anti-bribery, fraud and corruption

prevention. In addition, there is another web-based module available for dealerships on similar topics issued by the Daimler Truck Group.

- *Suppliers* – the Daimler Truck Group also makes a Compliance Awareness module available to its Suppliers via its Business Partner Standards. The Business Partner standards are incorporated into all its supplier agreements and purchase order terms and conditions.

#### (4) The Center of Competence Human Rights

The Center of Competence for Human Rights is responsible for developing and steering of the Human Rights CMS. 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. It reports to the Human Rights Officer of the Daimler Truck Group, who oversees the risk management related to the fulfillment of human rights due diligence obligations. The Human Rights Officer of the Daimler Truck Group reports directly to the President & CEO and is responsible for ensuring the Board of Management of Daimler Truck Holding AG and Daimler Truck AG is regularly informed of the results of their work, at least once a year.

#### (5) Code of Conduct

Daimler Truck Group's values and principles are anchored in an overarching Daimler Truck Code of Conduct which provides Daimler Truck Group employees with guidance on how the Daimler Truck 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. The Code of Conduct is available to view at: <https://www.daimlertruck.com/en/company/compliance/daimler-truck-code-of-conduct>.

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

The Declaration of Principles, agreed upon by Daimler Truck, our General Works Council, the World Employee Committee and the IndustriALL Global Union, outlines Daimler Truck's commitment to human rights. It establishes the framework for achieving common goals, outlining our approach and our processes to respect and support human rights at Daimler Truck. It 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

As a participant in the **United Nations Global Compact**, we are committed to upholding clear principles: we respect human rights, safeguard the rights of employees and their representative bodies, and are dedicated to environmental protection.

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

The Daimler Truck [Business Partner Standards](#) define requirements for our business partners, including suppliers, in terms of respect for and support for human rights, good working conditions, environmental protection, and compliance with legal requirements. 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 DTFSAu's local terms applicable to our standard supplier purchase orders. The Business Partner Standards can be accessed via the link [Business Partner Standards](#).

(9) HR Compliance Framework

DTFSAu follows Daimler Truck Group's global HR compliance framework, which sets mandatory standards to ensure HR processes uphold legal, ethical and human rights expectations. This framework governs key areas such as recruitment, onboarding, employment documentation, background check requirements, training and ongoing monitoring, and supports the early identification of potential human rights or modern slavery related risks. These global standards apply across all Daimler Truck Group operations, including DTFSAu, and reinforce our commitment to maintaining fair, transparent and compliant employment practices with international human rights principles and Australian workplace laws, including adherence to the Fair Work Act 2009 and work health and safety obligations.

Both locally and globally, due diligence processes continue to expand and improve to ensure respect human for rights and to identify potential risks of modern slavery are identified within our supply chains.

## Section 4. Actions taken to Assess and Address Potential and Identified Risks

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

### PROCUREMENT

#### Supplier Due Diligence

Daimler Truck is committed to the responsible sourcing of production and non-production materials and services. Daimler Truck categorically rejects 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 CMS. 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.

At a global level, 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 prioritizes 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 global website](#) and [Annual Reports](#) for further information.

## Policy and Process

DTFSAu has locally enacted the Daimler Truck Group global procurement policy which DTFSAu follows for its local purchasing activities from Suppliers. Different categories of purchases are defined under the policy with different requirements that the purchasing department must adhere to e.g. the requirement to get a number of supplier quotes for certain types of purchases. After going through the policy defined procurement process and after a supplier passes the sanctions check mentioned in Section 3 above, they are issued with relevant materials as follows:

- Ongoing suppliers to DTFSAu are issued with a Supplier Agreement and in addition generally receive Purchase Orders for the relevant engagements under the Supplier Agreement. Each Purchase Order is also subject to our General Purchasing Terms and Conditions (including the Daimler Truck Business Partner Standards).
- One off or ad hoc suppliers to DTFSAu are issued with a Purchase Order for relevant engagements. Each Purchase Order is subject to our General Purchasing Terms and Conditions (including the Daimler Truck Business Partner Standards).

These materials are continuously reviewed and updated to ensure they meet local legal requirements and also Daimler Truck Group compliance requirements which are communicated by the Daimler Truck Group to DTFSAu as required. More information on the Modern Slavery relevant protections in these materials are detailed below.

Effective from 1 January 2025, DTFSAu has enhanced its current procurement process by moving procurement under the management of a dedicated procurement team who benefit not only from the global Daimler Truck procurement processes and network but also have extensive experience in procurement.

## 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 General Purchasing Terms and Conditions, the current version of which can be found using the link [general-purchasing-terms-and-conditions---dtaup-and-dtfs-feb26.pdf](#).

The General Purchasing Terms and Conditions contain a similar clause to the Supplier Agreement mentioned above requiring the supplier not to engage in Modern Slavery and/or child and forced labour along with the relevant warranties referred to above for our ongoing Supplier Agreements. In addition, DTFSAu has the ability to audit the Supplier's records in relation to the agreement.

## Ongoing suppliers – Supplier Agreement

Ongoing suppliers are generally on an ongoing Supplier Agreement. Most of our ongoing suppliers would generally be on a Supplier Agreement on our December 2021 version which contains

important clauses requiring a supplier not to engage in Modern Slavery and/or child and forced labour and a warranty from the Supplier 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.

The Supplier Agreement also contains an ability for DTFSAu to audit the Supplier's compliance with the Supplier Agreement.

Similar warranties have also been 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.

The Supplier Welcome Pack and our contractual clauses relating to Modern Slavery are continuously reviewed and updated to ensure they meet legal and regulatory requirements and to ensure the latest regulations and expectations of DTFSAu are reflected.

### **Mandatory contractual clauses on social responsibility and environmental protection**

An important part of the Daimler Truck Group's human rights due diligence is ensuring that our suppliers are contractually required to respect our human rights expectations as defined in our Business Partner Standards. These requirements are set out in the Group wide mandatory clauses on social responsibility and environmental protection.

## **DAIMLER TRUCK GROUP POLICIES & TRAINING**

Daimler Truck Group is committed to identifying, preventing, and addressing forced labour and modern slavery in its own operations and throughout its value chain. This commitment is implemented through robust human rights due diligence processes.

### **Daimler Truck 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. The Code of Conduct is available to view at: <https://www.daimlertruck.com/en/company/compliance/daimler-truck-code-of-conduct>.

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

- 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 as mandated by section 1317AI of the *Corporations Act 2001* (Cth) ("**Corporations Act**"), has a policy outlining the protections that will be afforded to employees, directors and/or suppliers who report serious wrongdoing at DTFSAu in accordance with Part 9.4AAA of the Corporations Act.

The Daimler Truck Group [whistleblowing system SpeakUp](#) enables employees, third parties, and workers in the value chain to raise concerns about suspected misconduct or rule violations worldwide and at any time. This includes potential breaches of human rights and environmental obligations involving direct and indirect suppliers... More information on the policy can be found using link [Whistleblowing System SpeakUp | Daimler Truck](#).

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 to via phone, email or online utilising the Daimler Truck SpeakUp whistleblowing platform ("**SpeakUp**") which can be accessed via the following link <https://www.daimlertruck.com/en/company/compliance/whistleblowing-system-speakup>.

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.

### Training Measures

- **Business Partners:** To raise awareness about human rights among our business partners, especially our suppliers, we provide the "compliance awareness module" at [www.dt-compliance-awareness-module.com/en](http://www.dt-compliance-awareness-module.com/en). Depending on their risk rating, suppliers also receive the link to the compliance awareness module via email. 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 2024, the Supplier Welcome Pack was updated to include a reference to the Compliance Awareness Module
- **Employees:** Furthermore, we provide internal training to raise employee awareness of human rights issues. The aim is to give them a basic understanding of corporate due diligence and social responsibility. In critical departments, such as the central Procurement Department, specialized formats like the Expert Module "Human Rights Compliance" convey human rights content within

the respective work context. By doing so, we enhance our employees' capacity to detect any adverse human rights impacts along the value chain at an early stage and to effectively address them. The training also empowers them to consistently uphold human rights standards when selecting and evaluating suppliers. During the reporting year, the following training courses were offered or conducted at the Group level.

- **Expert Module "Human Rights Compliance"**: The aim of the training is to clarify the relevance of human rights in everyday work life. The training is mandatory for all active employees of the administration of Daimler Truck AG and controlled Daimler Truck Group companies in the areas of Procurement, HR, Communications and Legal & Compliance, the Legal & Compliance network as well as the CEOs of the local units across the Group. The training is assigned automatically to these employees and must be repeated every three years.
- **Training on fulfilling human rights due diligence obligations for functional areas in Procurement**: The training courses held online across the Group conveyed an understanding of the importance of human rights due diligence obligations and explained the associated impact on the role and tasks of buyers. In particular, the obligations under the German Supply Chain Due Diligence Act were covered.
- **Expert Module "Compliance@Procurement"**: In addition, the purchasing functions were assigned the Company's own web-based "Expert Module Compliance@Procurement" in 2025, which also covers human rights issues. Employees in these functions must complete the online training every three years.
- The 'front-line' nature of the work of our procurement team makes them one of the most important layers of protection for DTAuP 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.

**All staff training on the Code:** Every DTAuP 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 DTFSAu employee must sign a confirmation that they will comply with the Code before commencing their employment.

#### The Daimler Truck Human Rights CMS

As mentioned in Section 3 above, the Human Rights CMS 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 Human Rights CMS 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 Human Rights CMS can be found using link [Human Rights Compliance Management System | Daimler Truck](#).

## **INTERNAL CONTROLS COMMITTEE**

DTFSAu's Internal Controls Committee is the relevant body that looks at a wide variety of risk, governance and compliance topics and includes all of DTFSAu Executive Committee (which includes all directors of DTFSAu), the Local Compliance Officer for DTFSAu as well as various members of management. A formal standing item on Modern Slavery is included, alongside other compliance, governance and risk topics.

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

DTFSAu and the Daimler Truck 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.

### Annual Effectiveness Review

The annual effectiveness review of programs, processes, and measures, including Supplier Compliance Due Diligence, is conducted uniformly across Daimler Truck Group entities, in line with that of other compliance fields. This annual effectiveness testing, part of the Annual Effectiveness Evaluation, assesses the adequacy, implementation, and effectiveness of all elements of the Human Rights CMS across the Daimler Truck Group.

### Human Rights CMS effectiveness testing

Part of the Human Rights CMS 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 Human Rights CMS.

### Additional Modern Slavery Risk Reporting at a local level

Outside of the Human Rights CMS process, if we are notified of a risk ad hoc or via the reviews of questionnaire responses received or via DTFSAu's Internal Controls Committee standing item on Modern Slavery, these would be escalated for discussion in the first instance between the DTFSAu General Counsel (Legal team) and the DTFSAu Local Compliance Officer. Where needed, the matter will then be further escalated to DTFSAu's Internal Controls Committee. So far, no risks have been reported.

## Section 6. Process of consultation with entities owned or controlled by DTFSAu

DTFSAu does not own or control any other entities other than DTFSAu and therefore this criterion is not applicable. DTFSAu chose to consult with representatives of DTAuP (local Legal and Compliance team) and the Daimler Truck Group (the team at Center of Competence for Human Rights at Daimler Truck AG) in preparing this statement.

## Section 7. Our priorities for the future

At the time of drafting this Statement, DTFSAu's priorities for the 2026 reporting period include the following initiatives (some of which are continuing initiatives from this reporting period):

- continuing to look for internal staff, dealer, and supplier training opportunities including the introduction of an in-person Modern Slavery Refresher Training session for employees which covers general information and an interactive quiz to test their knowledge on Modern Slavery;
- continuing our regular discussion on Modern Slavery management within our Internal Controls Committee;
- exploring potential changes to our annual supplier questionnaire to an annual declaration form and focussing the recipient list;
- scoping and inclusion of HR anti-modern slavery initiatives in 2026 Modern Slavery Statement;
- completing the annual Human Rights CMS (as mentioned in Section 3) for DTFSAu;
- reviewing other captive financier Modern Slavery statements on the public register from a continuous learning perspective reviewing and implementing further or updated Daimler Truck Group global initiatives; and
- continuing monitoring of any potential legislative next steps following the Modern Slavery Act 3-year review. We note that the government only recently responded to the review in December 2024 and we are still awaiting next steps in terms of legislative reform.