

# DAIMLER TRUCK

Australia Pacific



## MODERN SLAVERY STATEMENT (2024)

## 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 CEO

As we present our 2024 Modern Slavery Statement, Daimler Truck Australia Pacific Pty Ltd (**"DTAuP"**) 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 2018* (Cth) (the "**Act**").

DTAuP is part of the wider Daimler Truck Group of companies ("**Daimler Truck Group**"); and as part of this DTAuP has locally incorporated and enacted global initiatives that have been implemented by our ultimate parent company, Daimler Truck Holding AG ("**Daimler Truck**"). DTAuP and the wider Daimler Truck Group of companies recognise that Modern Slavery cannot be eradicated immediately, but 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.

DTAuP 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 DTAuP's Board of Management on 27 June 2025.



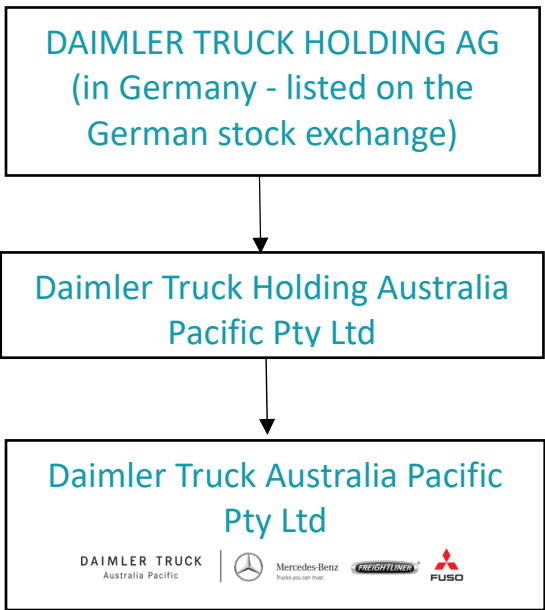
Daniel Whitehead  
Chief Executive Officer  
Daimler Truck Australia Pacific Pty Ltd

Section 1. Introduction

This Modern Slavery statement is made pursuant to the *Act* and covers DTAuP activities over the financial year 1 January 2024 to 31 December 2024. It has been prepared to comply with the requirements of the *Act* in order to meet the mandatory criteria as outlined in the Australian Border Force publication *Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities*.

DTAuP has a rich history in the Australian market dating back to the 1970’s, and has been operating under the current legal entity since 1 October 2017, following a corporate restructure in Australia. The company is responsible for importing, distributing and wholesaling component parts and vehicles from Mercedes-Benz, Freightliner and Fuso brands to Australian businesses and consumers. It is further responsible for importing, distributing and wholesaling component parts and vehicles from Mercedes-Benz and Freightliner brands to New Zealand businesses and consumers. DTAuP 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 STRUCTURE IN AUSTRALIA



DTAuP EMPLOYEE OVERVIEW IN AUSTRALIA

Location	Number of employees
Mulgrave Head Office	172
SelecTrucks, Somerton (used vehicle business)	6
NSW Regional Office	14
Brisbane Regional Office	7
Port Kembla Technical Services (NSW)	1
Parts Warehouse, Truganina	2

FY24. The data presented is based on figures applicable on 31 December 2024, unless specified otherwise.

## 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 2023-24 financial year, the Australian Federal Police received ...

**382 reports** of modern slavery and human trafficking in Australia.  
An increase of **42 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 2025.

<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>.

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.

This statement outlines the measures we have taken in 2024 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

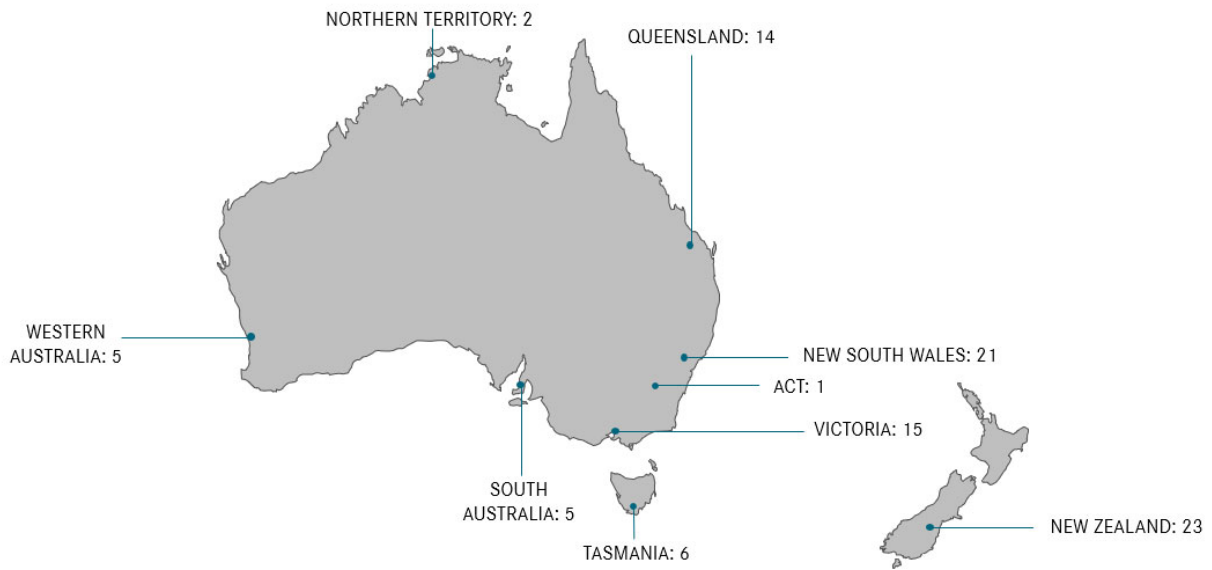
DTAuP are committed to upholding respect for human rights, which is a central aspect of its sustainable business strategy. DTAuP endeavours to ensure these fundamental rights are respected and measures are implemented to address Modern Slavery both within its own business and throughout its supply chain.

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

Mercedes-Benz Trucks, Freightliner and Fuso commercial vehicles, as well as Mercedes-Benz and Fuso buses are distributed through DTAuP in Australia and New Zealand. These component parts and vehicles are sourced from three key suppliers who are part of the Daimler Truck Group: Daimler Truck AG of Germany, Daimler Trucks North America LLC ("**DTNA**") based in the United States of America, and Mitsubishi Fuso Truck and Bus Corporation ("**MFTBC**") based in Japan.

In 2024, these vehicles and parts were distributed to DTAuP's former warehouse in Laverton, its new warehouse in Truganina, as well as to 69 dealerships across Australia and 23 dealerships in New Zealand.

## DTAuP DEALERSHIP NETWORK



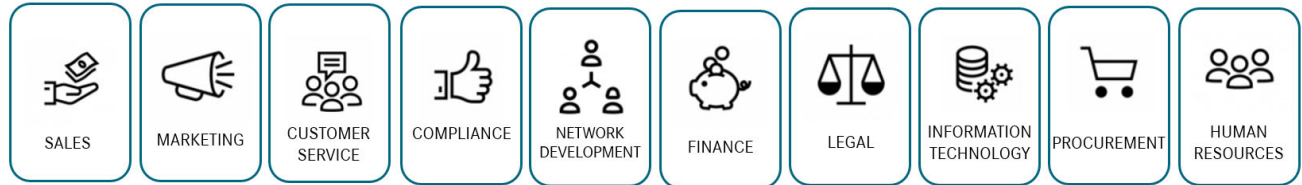
From an operations perspective, locally DTAuP work collectively with suppliers for goods and services located both domestically and overseas.

## WORLDWIDE SUPPLY PARTNERS



## OVERVIEW OF OPERATIONS

These suppliers play an essential role to DTAuP'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.

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

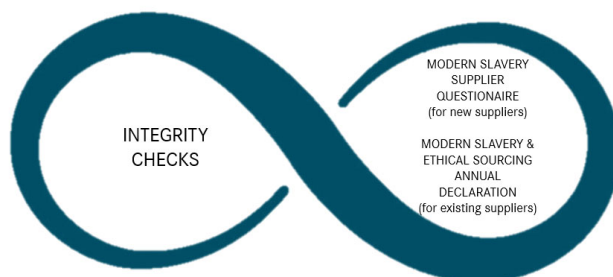
DTAuP have not identified any severe risk of Modern Slavery in our local supply chains thus far. Generally, there is a low risk in our direct product line, however, we consider there to be risks when procuring wider services such as clothing, food, vehicle parts and electronics.

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

Risk	Description
Raw materials	There are a range of raw materials that are used in our products, which can include steel, rubber and plastic. Some of these materials 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 we are associated with, such as the resources and mining sector.

Locally, DTAuP 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 DTAuP's due diligence processes which include the following:





(1) Integrity Checks

As a part of our compulsory pre-screening process, DTAuP 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 DTAuP's systems for payment, the supplier is required to complete the Vendor Creation Form. This form includes a Modern Slavery Questionnaire, 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.

(3) Modern Slavery Supplier Questionnaire

After completing our Integrity Checks, but before entering into any new agreement to conduct business with a prospective supplier, the supplier must complete a Modern Slavery Supplier Questionnaire ("**Questionnaire**") as part of a compulsory pre-screening process to ensure all Modern Slavery risks are identified prior to engagement. The Questionnaire is embedded into the Vendor Creation Form so that it can capture all new suppliers being established in our internal systems for payment.

In 2024, we reviewed and revised the Questionnaire to streamline the process, making it easier to complete while ensuring the right questions are asked and that additional information is provided to support accurate responses (e.g. providing guidance on when a Modern Slavery Statement is required, enabling businesses to accurately determine whether they are legally obligated to have and submit a statement). We have also refined the process by which our internal team reviews these questions, placing the responsibility on the business user to assess the responses to the Modern Slavery questionnaire, rather than on our procurement or accounting teams, and to escalate to our Legal team where required.

The Questionnaire assists with assessment of whether the supplier is aware of or has identified, assessed and addressed any risks of Modern Slavery within its supply chains. If a supplier indicates any risk of Modern Slavery within its supply chains, this is 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.

(4) Top 15 External Suppliers

In 2024, DTAuP revised its process and the Modern Slavery Supplier Questionnaire which was previously sent to all suppliers on an annual basis is now only sent to the Top 15 Suppliers annually (excludes government, bank, intercompany organisations and dealers). This change was implemented due to previously low response rates and now allows DTAuP to conduct a more thorough review of responses and follow up directly with the Top Suppliers where required. This helps DTAuP more effectively and consistently identify and assess its Modern Slavery risks.

(5) Modern Slavery & Ethical Sourcing Annual Declaration

In 2024, we launched the Modern Slavery & Ethical Sourcing Annual Declaration, which was sent to existing suppliers in December 2024 for completion. This new declaration replaces the previous annual Modern Slavery Questionnaire. This update is part of our continued commitment to improving our processes and adopting a more effective approach to tackling modern slavery and promoting ethical sourcing across our supply chain.

The introduction of this declaration underscores our commitment to enhancing transparency and accountability. We believe that this streamlined, simplified process will encourage a higher response rate while maintaining supplier accountability, ensuring our supply chain remains aligned with our ethical standards and legal requirements.

We are pleased to report that we received 179 completed annual declaration confirmations, marking a 22% increase from the 147 responses we received for the previous year's Modern Slavery Questionnaire. This increase demonstrates a positive shift in engagement and underscores the importance of our collective efforts to combat modern slavery and promote ethical sourcing.

(6) Modern Slavery Committee

In April 2022, DTAuP established a committee with members from across the business, including representatives from three key business units, procurement, compliance, and legal, all nominated by DTAuP's board of management. In 2024, the committee membership was reviewed as part of an internal restructuring aimed at unifying our three brands and was again later reviewed to include representation from finance. The committee now includes representatives from the following departments: (1) Legal; (2) Compliance; (3) Procurement; (4) Sales; (5) Aftersales; and (6) Finance. This committee was created as an internal initiative to serve as an ongoing project dedicated to upholding human rights. Its purpose is not to eliminate Modern Slavery entirely, but rather to collaborate as a group in implementing actions that identify, assess, and address Modern Slavery risks.

(7) Industry Comparison

The Modern Slavery Committee completed a comprehensive industry comparison of modern slavery statements to identify any gaps and areas in our processes that may need adaptation or improvement.

Globally, Daimler Truck values and is committed to respecting human rights. It has implemented the following initiatives across the Daimler Truck Group:

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

This system applies to all Daimler Truck Group companies, majority shareholdings and its supply chains. It allows for risk-based and systematic assessments of the fulfilment of human rights due

diligence obligations within the Group and its supply chains, and is based on requirements of applicable laws and internationally recognised standards such as the UN Guiding Principles on Business and Human Rights. It includes risk analyses, the implementation of preventive and remedial measures as well as continuous development and monitoring. Specific measures include mandatory training on human rights for relevant functions such as purchasing, designed to mitigate the risks of human rights violations. More information on the HRCMS can be found at <https://www.daimlertruck.com/en/sustainability/social/human-rights-compliance-management-system> and [Daimler Truck Annual Report 2024](#).

(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 within sixty (60) days of receipt.

(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 2024, 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. The Code of Conduct is accessible 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 ("**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 realize 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 DTAuP'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**

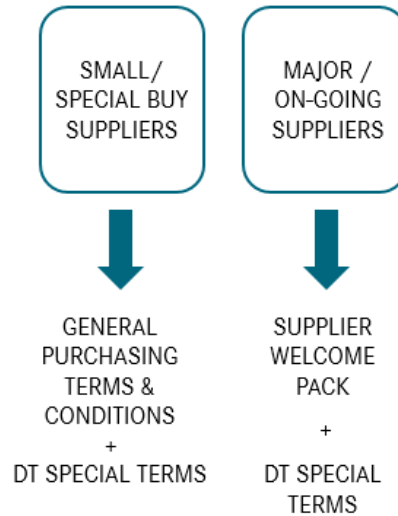
DTAuP has implemented the following processes, policies and practices to assess and address any potential and identified Modern Slavery risks.

### **MODERN SLAVERY COMMITTEE**

As mentioned in Section 3 above, DTAuP set up a committee in 2022 to implement further actions in relation to not only identifying, but assessing and addressing Modern Slavery. This committee collectively manages modern slavery risks that are identified, and further collaborate to find ways to reduce DTAuP's exposure to 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 General Purchasing Terms and Conditions, the current version of which can be found using the link [general-purchasing-terms-and-conditions—dtaup-and-dtfs-5aug24.pdf](#).

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 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 DTAuP are reflected.

#### 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 DTAuP 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 DTAuP 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**”) which is publicly available to view at: [https://www.daimlertruck.com/fileadmin/user\\_upload/documents/company/compliance/Daimler-Truck-Code-of-Conduct-english.pdf](https://www.daimlertruck.com/fileadmin/user_upload/documents/company/compliance/Daimler-Truck-Code-of-Conduct-english.pdf), 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](#).

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

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 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 DTAuP 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 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.

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**

#### General training for top executives of DTAuP

Outside of the procurement team, DTAuP also sees the need for the executive management team and senior managers of DTAUP to be aware of the risks of Modern Slavery to our business. Accordingly, initial executive training was completed in 2021 to coincide with the commencement of the modern slavery legislative requirements, in order to educate and empower the group to identify risks or instances of Modern Slavery and take the actions required to assess and/or escalate these findings appropriately. Furthermore, targeted executive employee awareness on the risks of Modern Slavery to our business is ongoing with training being rolled out to new executive employees and a comprehensive annual update being provided to the Board of Management. These senior employees are responsible for ensuring their teams are aware of Modern Slavery risks and the reporting process which applies to all employees.

#### The Daimler Truck HRCMS

As mentioned in Section 3 above, 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**

DTAuP 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

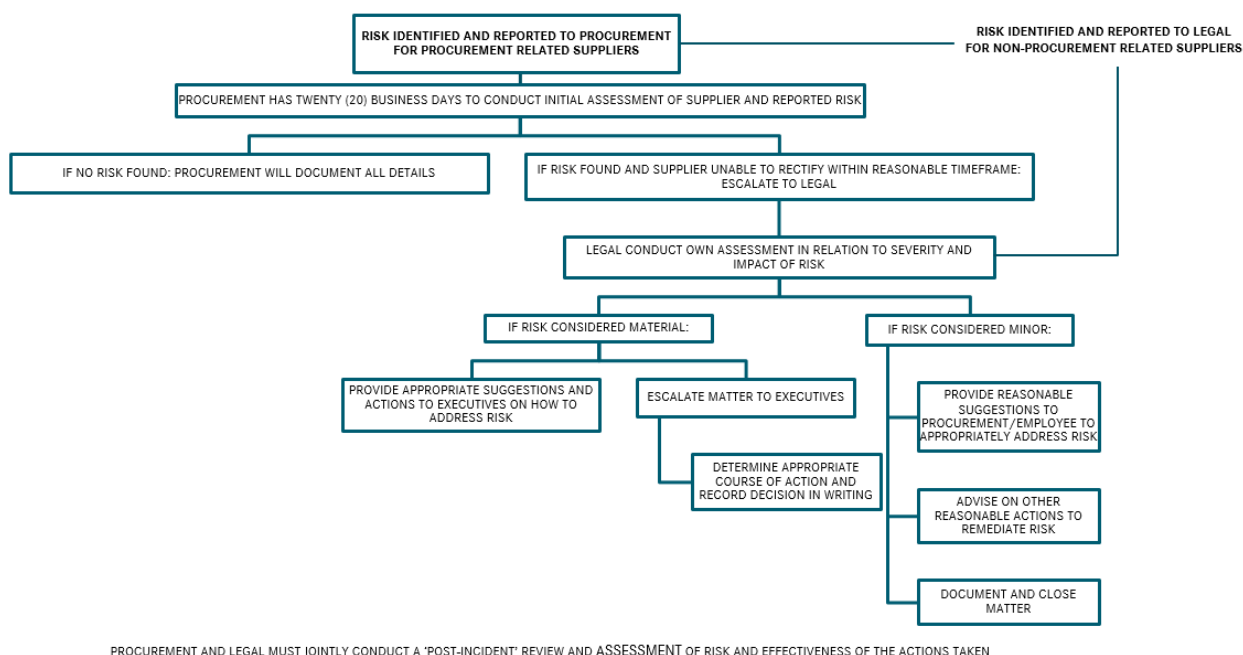
Part of the HRCMS involves effectiveness testing of the human rights measures assigned to entities within the Daimler Truck Group. This effectiveness testing is completed annually across the Daimler Truck Group as part of an Annual Effectiveness Evaluation and measures the adequacy, implementation and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

### Modern Slavery Risk Reporting Process

Outside of the HRCMS process, DTAuP 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.

DTAuP 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:



## Section 6. Process of consultation with subsidiary entities in preparing the statement

DTAuP does not have any subsidiary entities but has consulted with representatives from its parent company, Daimler Truck Group (the team at Human Rights & Public Law department at Daimler Truck AG), in preparing this statement.

Both DTAuP and the Daimler Truck Group recognise the need for a coordinated approach to addressing the risk of Modern Slavery in its distinct and shared work force and supply chains.

## Section 7. Our strategy for the future

At the time of drafting this Statement, DTAuP's priorities for the 2024 reporting period include the following initiatives (some of which are continuing initiatives from this reporting period):

- Review of the Modern Slavery Committee membership, with updates to include representation from the finance team;
- Revision of the Modern Slavery Questionnaire questions in the Vendor Form, along with an updated instructions guide, to place greater responsibility on business users within DTAuP for ensuring compliance;
- Updates to the Supplier Welcome Pack to include reference to the Compliance Awareness Module;
- Replacement of the annual Modern Slavery Questionnaire with an Annual Declaration form sent to all suppliers to improve response rates, while continuing to send the Questionnaire annually to the Top 15 suppliers of DTAuP based on spend;
- Further engagement of the internal Modern Slavery Committee in developing new initiatives to manage modern slavery risks across the business;
- Raising further awareness by providing an overview of modern slavery to all new starter employees as part of induction training delivered by the legal and compliance team;
- Ongoing monitoring of internal policies and procedures to manage modern slavery risks;
- Continuation of new supplier Questionnaires to identify and assess modern slavery risks; and
- Completing annual HRCMS (as mentioned in Section 3) for local entities.