



## **Anti-Slavery and Human Trafficking Policy**

Updated and effective as of February 2024

This Anti-Slavery and Human Trafficking Policy is made by and on behalf of Trackunit ApS, and its subsidiaries and constitutes our group's slavery and human trafficking statement.

### **Introduction**

Trackunit is among the world's leading companies in the industrial internet of things with a focus on innovative solutions to players within the construction, equipment rental and material handling industries. Trackunit develops and provides solutions for the entire value chain, from machine manufacturers, machine dealers, machine rental houses, contractors and operators.

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year. Trackunit has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We have a number of policies in place to ensure all our employees have the rights to work and are paid fairly, and that we have effective measures in place to ensure slavery is not present anywhere in our business or supply chain. This includes our Equal Opportunities policy, which encompasses recruitment, promotion, training, performance management and reward. Our principles of fair treatment and respect are also applied to our relationships with customers, suppliers, contractors, shareholders, and other stakeholders.

### **Policy**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Trackunit is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment, and we may amend it at any time.

### **Responsibility with the Policy**

Trackunit has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Trackunit has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training in it. You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Trackunit VP – General Counsel.

If you encounter any breach or suspect any breach of this Policy, you must notify Trackunit VP- General Counsel, as soon as possible.

**Supplier Compliance**

Our suppliers and contractors are in general contractually required to comply with applicable laws and regulations including Modern Slavery Act. Trackunit regularly assess our material supplies to evaluate if any particular risk arises in respect of slavery and human trafficking. In light of our perceived minimal risk, we do not anticipate auditing our suppliers, to evaluate their compliance with this Policy. Suppliers shall agree to implement due diligence procedures for their own suppliers, subcontractors, and other participants, and they shall acknowledge that neither they nor any of their officers, employees, or other associates have been convicted of any offence involving slavery and human trafficking.

If Trackunit perceives a higher risk of a supplier conducting in slavery or human trafficking, Trackunit will conduct auditing of that supplier, and receive confirmation that the supplier is not in violation of Modern Slavery Act.



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