



DAIMLER TRUCK CANADA LTD.

Modern Slavery Report

Date May 30, 2026

Contents

Section 1 - Commitment to Uphold Human Rights in our Supply Chain.....2

Section 2 - Introduction: Overview of Corporate Structure and Activities.....2

Section 3 - Overview of our Supply Chain.....4

Section 4 - Forced Labor and the Automotive Supply Chain.....4

Section 5 - Identifying Forced Labor and Child Labor Risks in the Supply Chain.....5

A Message from our Canadian Officers



Daimler Truck Canada Ltd. (“DTCL” or “the Company”) is pleased to provide its Modern Slavery report under the Act to Enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Act”), in recognition of the global concern about Modern Slavery in supply chains.

DTCL is part of the wider Daimler Truck-Group of companies (“Daimler Truck-Group”) and has locally incorporated and enacted global initiatives that have been spearheaded by our ultimate parent company, Daimler Truck AG in cooperation with its worldwide subsidiaries. DTCL and the Daimler Truck-Group recognize that Modern Slavery cannot be eradicated instantaneously, however, we are committed to meeting our human rights due diligence obligations and conforming with the objectives of the Act.

People are at the core of our business. Our goal is to ensure that fundamental human rights are respected within our operations and by our business partners. To help us uphold these values and demonstrate our commitment, we have established standards and expectations that guide our actions and set clear requirements for our suppliers. These expectations are included in our:

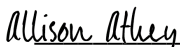
- ✓ Daimler Truck Code of Conduct- https://www.daimlertruck.com/fileadmin/user_upload/documents/company/compliance/Daimler-Truck-Code-of-Conduct-english.pdf,
- ✓ Declaration of Principles on Social Responsibility and Human Rights- <https://www.daimlertruck.com/en/sustainability/s-social/human-rights/declaration-of-principles>
- ✓ Supplier Business Partner Standards - Doing the Right Thing Together (Updated March 2025) [Business Partner Standards](#),
- ✓ Sustainability: Human rights- <https://www.daimlertruck.com/en/sustainability/s-social/human-rights-in-the-supply-chain>
- ✓ Human Rights Compliance Management System (Human Rights CMS)- <https://www.daimlertruck.com/en/sustainability/social/human-rights-compliance-management-system>
- ✓ Compliance Awareness Module for Sales Business Partners and Suppliers: <https://www.dt-compliance-awareness-module.com/en/>
- ✓ Whistleblowing system SpeakUp to report human rights violations in our own businesses and the supply chain <https://www.daimlertruck.com/en/sustainability/s-social/complaints-procedure>,
- ✓ Tender processes and supplier agreements, including our applicable standard terms and conditions of Purchase.

DTCL is committed to continually improving and developing best practices in identifying, monitoring, managing, and reporting on Modern Slavery in our operations and supply chains.

This statement was approved by DTCL’s Operating Committee on May 15, 2026.

Signed by:

B46C1159A3A0B44F6
Glen White, Vice President & Regional General
Manager – On-Highway Sales

Signed by:

6CDB485EAD741C
Allison Athey, Vice President & Regional General
Manager – Vocational Sales

Daimler Truck Canada Ltd.’s Modern Slavery Report Under the Act to Enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act

Section 1

Commitment to Uphold Human Rights in our Supply Chain

The Daimler Truck Group recognizes its fundamental responsibility to respect and support human rights. Both the Daimler Truck Group and DTCL are committed to ensuring fundamental rights are protected and measures are actively implemented to address the risks of modern slavery within our own operations and across our supply chain. We are dedicated to preventing human rights violations, with a particular focus on our employees and our direct business partners, especially our suppliers.

To support this commitment, we have implemented measures designed to ensure that the procurement of production and non-production materials and services worldwide align with our sustainability and human rights standards. Additionally, experts from key internal departments – including Procurement, Compliance, Trade Compliance, and Legal – work collaboratively across functions at a global level to promote and embed these values from multiple perspectives.

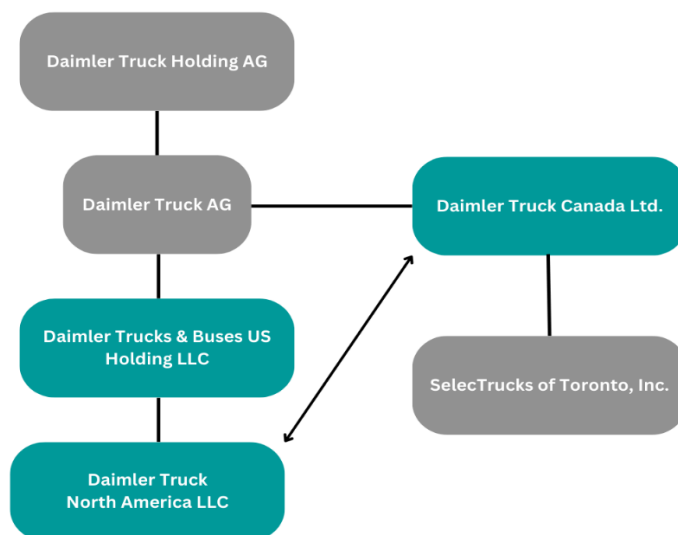
Through these coordinated efforts, both globally and locally, we are progressing toward greater respect for human rights within our supply chains. This statement details the actions we have taken in 2025 to strengthen our local policies and procedures, ensuring we play an active role in detecting and mitigating modern slavery risks.

Section 2

Introduction: Overview of Corporate Structure and Activities

This Modern Slavery Statement outlines DTCL’s activities for the fiscal year ending December 31, 2025. It has been prepared in accordance with the requirements of the Act and addresses the mandatory criteria outlined in Public Safety Canada’s *Guidance for Preparing Reports – Entities*. DTCL has operated in the Canadian market since January 23, 2003 (business number 861828937RC0002), and is responsible for importing, distributing, retailing, and wholesaling heavy-duty vehicles and aftermarket component parts to Canadian dealers on behalf of its affiliate, Daimler Truck North America LLC (DTNA). Locally, DTCL wholly owns SelecTrucks of Toronto, Inc. The ultimate parent company of DTCL, DTNA, and SelecTrucks of Toronto is Daimler Trucks & Buses US Holding LLC.

Parents and Subsidiaries



April 15, 2026

DTCL has a total of 81 employees based in Mississauga, Ontario and its distribution center in Calgary, Alberta.

Daimler Truck Canada Ltd – Distribution Network

Brands	Full Service	Service & Parts	Parts Only	Total
Dual Branded	50	16	4	70
Freightliner Only	17	4	1	22
Western Star Only	13	4	1	18
Total Truck Outlets	80	24	6	110
Brands	Full Service	Service & Parts	Parts Only	Total
Distributor Owner Groups	2			
Distributor Locations	24			
Thomas Built Buses – Owner Group	7			

Locally, DTCL serves as the Canadian importer, distributor, and wholesaler of Freightliner™ and Western Star™ branded heavy- and medium-duty trucks (Class 5–8), designed for a variety of commercial and vocational applications, as well as aftermarket component parts to support the ongoing service of these vehicles. Freightliner and Western Star trucks are manufactured by DTNA at its truck production facilities in the United States (Portland, Oregon; Cleveland and Mt. Holly, North Carolina) and in Mexico (Saltillo, Coahuila, and Santiago, Nuevo León). In addition to Freightliner and Western Star, DTNA owns several other brands, including Detroit Diesel, Demand Detroit, Thomas Built Buses, Alliance Parts (Aftermarket), and SelecTrucks (resale of used trucks). Aftermarket parts are primarily shipped from DTNA’s network of Parts Distribution Centers located throughout the United

States. Canadian dealers also have the option to purchase parts directly from suppliers through DTNA's Direct Ship Program and Alliance Parts.

Detroit-brand engines and transmissions are manufactured in Detroit, Michigan, and at Detroit Remanufacturing plants across the United States and in Toluca, Mexico. Detroit axles are produced both in Detroit and in Saltillo, Coahuila, Mexico.

Section 3

Overview of our Supply Chain

Production components and parts, including those for Aftermarket sales, are sourced from DTNA's global supply chain comprising more than 1,800 active suppliers and more than 141,000 parts. Suppliers' production locations are principally located in North America (US, MX and Canada), Europe (Germany, Hungary, Poland, Romania, Portugal, Spain, Italy, France, The Netherlands), and Asia (China/Hong Kong, Taiwan, Thailand, Turkey, Japan, Viet Nam, India) and South Africa.

Section 4

Forced Labor and the Automotive Supply Chain

Among the countries previously mentioned, the supply chain risks in China, Hong Kong, and Taiwan — markedly, though not exclusively, in China's Xinjiang Uyghur Autonomous Region (XUAR) — present significant concerns for the automotive industry. Raw materials mined, parts manufactured, and subcomponents assembled in China feed into the global supply chain, amplifying the risk of forced labor exposure. This issue became especially apparent during the COVID-19 pandemic and the subsequent collapse of global supply chains. Recently, geopolitical complications around China's dominance in refining, especially heavy rare earths, continues to create significant supply chain bottlenecks.

In 2020, reports began to emerge highlighting the detention and forced labor transfer of Uyghur and other Muslim minorities within and beyond the XUAR. That same year, the U.S. Department of Labor's Bureau of International Labor Affairs added five goods produced by Muslim minorities under forced labor conditions in China to the 2020 edition of the TVPRA List (Trafficking Victims Protection Reauthorization Act List), titled *Against Their Will: The Situation in Xinjiang*.

Further international concern was underscored in August 2022, when the Office of the United Nations High Commissioner for Human Rights (OHCHR) released its *Assessment of Human Rights Concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China*. The report concluded that "[t]he extent of arbitrary and discriminatory detention of members of Uyghur and other predominantly Muslim groups, pursuant to law and policy, in the context of restrictions and deprivation more generally of fundamental rights enjoyed individually and collectively, may constitute international crimes, in particular crimes against humanity."

In addition to government and international agency findings, non-governmental organizations have contributed to the growing body of evidence connecting automotive supply chains to forced labor in the region. Notably, the Helena Kennedy Centre at Sheffield Hallam University published the *Driving Force – Automotive Supply Chains and Forced Labor in the Uyghur Region* report in December 2022. More recently, in February 2024, Human Rights Watch released *Asleep at the Wheel – Car Companies' Complicity in Forced Labor in China*, alongside Bitter Winter's report, *Uyghur Forced Labor Increased in 2023*.

Section 5

Identifying Forced Labor and Child Labor Risks in the Supply Chain

Child Labor is defined by ILO (International Labor Organizations) Conventions 138 on the Minimum Age for Admission to Employment and 182 on the Worst Forms of Child Labor. These are the two "fundamental" international treaties established to combat and eventually eliminate child labor worldwide. Included are provisions regarding types of employment by minimum ages as established in national legislation, precludes hazardous unpaid household services and emphasizes the completion of schooling. Convention 182 defines the worst forms of child labor to include all forms of slavery or practices similar to slavery, such as the sale or trafficking of children, debt bondage, and serfdom, or forced or compulsory labor or work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.

Forced Labor is defined by ILO Convention 29 as “all work or service exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.”¹

Identifying potential risks of forced labor and child labor in the supply chain is complicated as demonstrated by a small sample of newspaper clippings from 2025.

- **Audit Uncovers Child Labor at Shein Suppliers**
 Shein disclosed finding two cases of child labor at its third-party suppliers after conducting over 4,300 audits, showing the difficulty of policing vast supply chains.
February 27, 2025 – The Guardian
- **Harsh Conditions in India’s Shrimp Industry**
 CNN uncovered forced-labor-like conditions among female workers in India’s shrimp export industry, exposing how labor abuses are often hidden behind legal paperwork and remain invisible to global buyers.
February 2025 – CNN, “The Great Illusion” Series
- **Child Labor in U.S. Food Processing Plants**
 Perdue Farms settled a Labor Department investigation after minors were found working overnight shifts in hazardous conditions, revealing that child labor risks exist even in domestic supply chains through subcontractors.
January 15, 2025 – Reuters
- **China rejects UN experts' concerns for alleged forced labour in Xinjiang.**
 UN experts* today expressed deep concern regarding persistent allegations of forced labour affecting Uyghur, Kazakh and Kyrgyz minority groups as well as Tibetans within the Xinjiang Uyghur Autonomous Region and across other parts of China".
January 23, 2026 – Reuters

¹ Department of Labor - Bureau of International Labor Affairs - Child Labor, Forced Labor & Human Trafficking

As companies respond to shifting geopolitical landscapes, strategies like nearshoring, friend-shoring, and reshoring have been adopted to varying extents. However, when it comes to addressing forced labor and child labor risks, these approaches alone do not necessarily eliminate—or even meaningfully reduce—such risks without the following critical elements in place:

1. **Comprehensive transparency** across the entire downstream supply chain, starting from the very first raw material input and continuing through every subcomponent and component incorporated into the final product.
2. **Internal and external risk assessment training** on forced labor and child labor, ensuring that both employees at subsidiaries and affiliates, as well as external suppliers, are properly educated and equipped.
3. **A structured action plan** to proactively address and remediate any forced or child labor risks identified within the supplier base.
4. **A robust, multi-dimensional, cross-functional program** for risk management, communication, and effectiveness testing, developed in partnership with suppliers as active collaborators.

Our Approach

The Daimler Truck-Group participates in the UN Global Compact and is committed to the UN Guiding Principles for Business and Human Rights. Particular importance is placed on the International Bill of Human Rights together with the core labor standards of the International Labor Organization (ILO). The Daimler Truck-Group is committed to preventing human rights violations from occurring with its employees and business partners, in particular suppliers. The aim is to respect human rights and to implement necessary measures and processes to fulfill its due diligence obligations.

Acknowledging this commitment, DTCL, in collaboration with DTNA and the Daimler Truck Group, has established a due diligence program incorporating the four features described above:

- ✓ To fulfill human rights due diligence obligations at the Daimler Truck Group level, we apply a systematic approach through our Human Rights Compliance Management System. This system is grounded in the requirements of applicable laws and internationally recognized standards, such as the UN Guiding Principles on Business and Human Rights. The Human Rights Compliance Management System outlines fundamental principles and measures designed to promote compliant behavior. It applies both to Group companies and majority shareholdings, as well as to our broader value chain. Supplier due diligence (described below) is an integral component of the Human Rights Compliance Management System. Additional information on the processes and measures implemented at the Daimler Truck Group level can be found in our annual reports: <https://www.daimlertruck.com/en/sustainability/reportings>.
- ✓ Group-level supplier due diligence: We conducted a systematic risk analysis of tier-1 suppliers across the Daimler Truck Group using a newly introduced IT tool. This is complemented with other tools that analyze business to business relationships and others that review sanctions and ownership relationships. In 2025, an additional tool was added to provide systemic risk-analysis and affords a further abstract risk assessment of suppliers based on various human rights risk indicators, particularly considering their geographic location and the use of critical raw materials or commodities. Suppliers identified as high-risk through this process are then subjected to a more detailed risk analysis, which includes additional evaluation measures such as supplier self-assessment questionnaires. Based on results, appropriate measures are determined to mitigate identified risks. These measures may include qualification initiatives such as supplier training, supplier questionnaires and programs or direct supplier dialogues. When

necessary, we also implement further investigation and risk monitoring activities and other actions as required. These tools continue to be used going forward.

- ✓ We continued to utilize risk and resilience, third-party supply chain companies to AI-map and understand our supply chain, while integrating a data intelligence tool – the same tool that supports U.S. Customs and Border Protection in its forced and child labor due diligence – into the system. This integration enables the rapid identification and linkage of potential downstream suppliers who are either (i) listed on the Uyghur Forced Labor Prevention Act (UFLPA) Entity List or (ii) associated with forced or child labor through investigations conducted by non-governmental organizations, such as Sheffield University.
- ✓ Group-level supply chain assessments: When evaluating human rights risks along the production material supply chain, particular focus is placed on raw materials that may be mined or processed under critical human rights conditions. We conduct reviews of suppliers with these raw materials through supply chain assessments. Our supply chain assessments consist of three steps:
 1. Creating transparency throughout the respective raw material supply chains
 2. Identifying risk hotspots within these supply chains
 3. Defining and implementing appropriate measures to address identified risks, when necessary.
- ✓ We continued to integrate the use of critical raw materials as a risk indicator into the systematic risk analysis of our suppliers (as outlined above). Additionally, our participation in initiatives focused on responsible raw material supply chains – such as the "Responsible Minerals Initiative" and various industry associations to strengthen efforts to promote ethical sourcing, particularly from countries with a high risk of human rights violations.
- ✓ We continued to raise awareness among employees across the Daimler Truck Group by offering various internal training programs focused on human rights, providing a foundational understanding of corporate due diligence and social responsibility. To ensure relevance, human rights topics are tailored to specific working environments and delivered through specialized training for key departments, particularly Purchasing and Sales. We continue to utilize training modules of "Human Rights Compliance," which became mandatory worldwide for designated target groups, such as central Purchasing and Human Resources teams. This module covers general human rights principles, potential risks of human rights violations, and the Daimler Truck Group's approach to meeting its human rights due diligence responsibilities.
- ✓ We upheld the Daimler Truck Business Partner Standards, which define our expectations for all business partners, including suppliers, and emphasize the critical importance of combating forced and child labor within the Daimler Truck Group supply chain.
- ✓ We continued to reinforce supplier awareness of our standard terms and conditions, which include explicit prohibitions on forced labor and related compliance obligations, as well as the requirements outlined in the *Supplier's Guide to Successful Business at Daimler Trucks North America LLC*. We addressed forced labor due diligence during quarterly supplier calls and its annual Supplier Day Conference.
- ✓ We continued to advance the implementation of a multi-faceted, cross-functional team designed to holistically address a wide range of environmental, social, and governance (ESG) topics, including human rights, supply chain transparency, CO₂ emissions, carbon footprint reduction, and cybersecurity and data protection.

Parts of our business and supply chains that carry a potential risk of forced labor or child labor being used and the steps taken to assess and manage that risk.

Risk	Description
Raw Materials	Lithium, cobalt, nickel, graphite, tin, tungsten, aluminum, copper, rare earth metals, steel/iron, natural rubber, manganese, platinum, palladium, rhodium, iridium, chromium, niobium, magnesium, molybdenum, silica/silica sand, zinc.
Lack of Visibility	We recognize we have decreased visibility into our complex global supply chain and the manufacturing and labor standards of suppliers deep in that chain.
Labor Exploitation	We are aware and recognize the risk of labor exploitation in various sectors within the larger automotive sector.

In recognizing these risks and reaffirming our commitment to meaningful action, we are guided by our social responsibility to maintain a supply chain free from forced and child labor, our financial obligations to our stakeholders and employees, and our promise to build the very best vehicles *for all those that keep the world moving* – our customers. To that end, the Company is launching a sustainable program designed to:

- (i) enhance visibility and transparency across the entire supply chain;
- (ii) strengthen our agility to respond swiftly to potential disruptions;
- (iii) foster deeper cross-functional and partner collaboration; and
- (iv) extend our influence and oversight across the complete end-to-end supply chain.

To achieve this important goal, the Company is drawing on one of its greatest strengths – the talent and expertise of our people across the organization, especially within Procurement and Supply Chain Management. After being presented with this challenge, our teams have stepped forward with determination. Working closely with our Compliance team, they have developed a unified set of talking points and actionable measures to guide supplier engagement whenever potential concerns arise during the supply chain mapping process.

Supply Chain Mapping at DTNA/DTCL

At this stage, it is important to explain what supply chain mapping is – and just as importantly, what it is not. Supply chain mapping leverages third-party AI technology to map a company’s supplier network, reaching as many tiers deep as possible. This AI-driven process relies on publicly available data sources, including bill of lading records, product information, and data obtained through web scraping, such as supplier websites, company activities, ownership structures, security filings, and other accessible business information. The outcome is a “most likely” representation of the supply chain – a probability-based model rather than a definitive one.

It is critical to recognize that AI-enabled supply chain mapping does not produce a fully accurate or complete picture. The complexity of global trade introduces numerous challenges: bills of lading may be incomplete or inaccurate, customer part numbers are frequently absent, HTS codes can be erroneous, and the use of third parties – including 3PLs, freight forwarders, and customs brokers – can obscure the true supplier or consignee. In some countries, trade data disclosure is not mandatory, and when it does occur, long lead times may cause data delays. Press releases, outdated partnership announcements, and other legacy online content may also be incorporated into AI findings, often incorrectly. Additionally, suppliers served by multiple sub-tiers may generate “false positives” during the mapping process. Individually or collectively, these factors complicate efforts to establish a clear chain of custody, making it difficult to accurately trace goods back to their true source and country of origin.

AI mapping provides an initial indication of a company's potential supply chain. It is then the company's responsibility to validate and refine that map. Effective organizations collaborate closely with their suppliers, following a structured yet flexible process to confirm or correct the information. Maintaining the map's accuracy is an ongoing task, requiring continuous updates as the supply chain evolves, in order to ensure it remains a reliable tool.

Our supply chain mapping initiative began in December 2023 with the transmission of an initial set of suppliers. These suppliers were selected based on annual purchase volume and product categories, such as electronics. For context, mapping this initial group down to tier 8 yielded 21,962 potential suppliers across 45,211 sites.

To strengthen our due diligence processes, we have focused on suppliers operating in higher-risk countries, sectors/industries related to risk categories, and product types most associated with forced labour concerns. Leveraging risk-and-resilience methodologies and third-party supply chain intelligence providers, we utilize AI-enabled mapping tools to gain a deeper understanding of our supply chain. By integrating these data-driven technologies, we are able to identify and trace potential downstream suppliers who are either (i) listed on the Uyghur Forced Labor Prevention Act (UFLPA) Entity List or (ii) potentially linked to forced or child labour based on findings from reputable non-governmental organizations, such as investigations conducted by Sheffield University.

When downstream suppliers are identified by the mapping as being potentially listed on the UFLPA Entity List or otherwise flagged, a "risk map" is provided to the direct supplier to validate or refute this supply chain. If a sub-tier supplier is ultimately confirmed to have links to forced or child labor, our cross-functional team – including Procurement, Supply Chain Management, Legal, and Compliance – will intervene to address the risk. Depending on the situation, the team will implement risk prevention, mitigation, or remediation measures, and if necessary, secure alternate sources of supply free from such links.

DTCL has not identified any conclusive forced labor or child labor in its supply chain through the mapping performed to date.

Conclusion

DTCL, in collaboration with DTNA and the Daimler Truck Group, has made significant strides in deepening our understanding of the challenges related to forced and child labor, the importance of maintaining a clean supply chain, and the tools and resources available to support this effort. However, this work remains ongoing. As we advance the program, we continue to learn and adapt. We actively monitor evolving legislation and regulations in this critical area of global concern, along with the expanding body of reports, studies, process recommendations, and evaluations that inform our approach and help shape credible standards to measure our progress effectively.