

## **Modern Slavery Act Statement on the prevention of Slavery and Human Trafficking at Kapsch TrafficCom Group**

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This statement is made pursuant to the UK Modern Slavery Act 2015 Section 54 and describes the steps taken by Kapsch TrafficCom Group in its financial year 2024/25 (ending on 31 March 2025) to combat slavery and human trafficking in its supply chains and businesses.

### **1. ORGANISATION'S STRUCTURE**

We are a globally renowned provider of transportation solutions for sustainable mobility with successful projects in more than 50 countries. Our innovative solutions in the application fields of tolling, tolling services, traffic management and demand management contribute to a healthy world without congestion.

As a one-stop-shop solution provider, Kapsch TrafficCom covers the entire value chain of customers, from components to design and implementation to the operation of systems.

This statement applies to all companies which are part of the Kapsch TrafficCom Group, including the parent company Kapsch TrafficCom AG with its registered seat in Austria and its subsidiaries, such as Kapsch TrafficCom Ltd. with its registered seat in the UK and Kapsch TrafficCom Inc. with its registered seat in the US. The full company structure is at this link: <https://www.kapsch.net/en/about-us/locations-worldwide/>

### **2. OUR SUPPLY CHAINS**

Our supply chains include the sourcing and procurement of finished goods, electronic-, mechanical- and electromechanical components, software, licenses and services to support our customer projects and installations as well as the production of our goods.

### **3. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that modern slavery or human trafficking do not occur in our supply chains or in any part of our business. Our corporate values reflect our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure that slavery and human trafficking do not take place anywhere in our supply chains.

Our Code of Conduct contains our core values as well as the principles and practices which we at Kapsch wish to follow. We take into account the interests, expectations and requirements of our various stakeholder groups. In particular, these are employees, customers, suppliers, other business partners, investors as well as the general public. A link can be found here: [Code of Conduct](#)

Our Supplier Code of Conduct sets out the principles, standards and the expectation, that suppliers follow these when working with us, to help us achieve responsible sourcing objectives. It defines the basic requirements placed on the suppliers and third-party intermediaries of Kapsch TrafficCom concerning their responsibilities towards their stakeholders and the environment. A link can be found here: [Supplier Code of Conduct](#)

The core values and other policies mentioned above are under regular review and assessment, to reflect more closely our commitments in relation to prevent slavery and human trafficking.

#### **4. DUE DILIGENCE PROCESSES IN RELATION OF SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk, we support the protection of international human rights within our sphere of influence and take care not to be complicit in human rights violations. We strictly reject all forms of forced or compulsory labor as well as child labor and human trafficking. We identify impacts concerning potential products/services and the respective business partners that provide them. According to this identification process, potential business partners are assigned a Supplier Tier (A to C), which determines the further requirements during the evaluation procedure. The whole procedure must be conducted before selection/onboarding of new business partners and is focused on the investigation and mitigation of identified impacts. Suppliers are required to complete a questionnaire, whereby this assessment does include procedures and questions based on the UN Global Compact and covering areas such as: Human Rights, Labor Rights, Decent Work, Modern Slavery, etc. to investigate their governance, policies, training and supply chain management processes.

Business partners with a certain business relevance for us are monitored and controlled regularly. These controls do include but are not limited to a broad range of crimes related to human rights violations, genocide, war crimes, hate crimes, Geneva Convention violations, unlawful imprisonment, extrajudicial executions, torture, ethnic cleansing, crimes against humanity, political persecution and political prisoners.

Business partners are also engaged directly through on site visits and review meetings focused on the evaluation of mitigations concerning identified impacts. Identified improvement actions concerning risks and opportunities are tracked and further evaluated based on their mitigation and/or implementation effectiveness through assigned and monitored findings.

#### **5. SUPPLIER ADHERENCE TO OUR CORE VALUES AND PROCESSES**

We have zero tolerance for slavery and human trafficking which is also reflected in our management system to ensure all those in our supply chain and contractors comply with our Supplier Evaluation & Selection Process Description. We are committed to a rigorous supply chain compliance program.

We have a committed compliance team, which consists of representatives from the following departments:

Legal	HSSEQ	Supply Chain Management
Human Resources	Investor Relations	Corporate Compliance
Sales	Trade Compliance	Internal Audit

**6. TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have established a training program for our staff. These trainings do focus on several compliance issues and requirements for screening and monitoring business partners related i.e. to human rights topics.

**7. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

We measure how effective we have been in ensuring that slavery and human trafficking do not occur in any part of our business or supply chains. These measures do include (but are not restricted to):

- Number of staff trained on issues concerning human rights
- Number of slavery reports received through whistleblowing
- Number of supplier audits

**Mr. Georg Kapsch**  
*Chief Executive Officer (CEO)*

**Mr. Samuel Kapsch**  
*Chief Operating Officer (COO)*