Modern Slavery Act Transparency Statement

For the financial year ended 31 December 2025

Opening Statement from Senior Management

Tekion is committed to ensuring that our business and supply chain reflect our values and respect for human rights, a principle we consider fundamental to our risk management strategy and the creation of long-term stakeholder value. As part of this commitment, we have taken steps to strengthen our practices to combat modern slavery and human trafficking in the financial year ended 31 December 2025 ("**FY 2025**") and we will continue to proactively look to further steps we can take to strengthen our practices in the upcoming financial year ending 31 December 2026 ("**FY 2026**").

Our commitment is evidenced by the new practices incorporated in FY 2025, including the introduction of clauses into new contracts with Tekion's suppliers and business partners requiring them to obey applicable laws and regulations on the fair treatment of workers and the provision of a safe and healthy work environment. We also took significant steps in FY 2025 to implement practices effective in FY 2026, namely the adoption of a modern slavery and anti-human trafficking policy and the introduction of compulsory modern slavery and anti-human trafficking training for all employees, both adopted on 15 April 2026.

In FY 2026, we will continue to take steps to combat and negate any modern slavery and human trafficking in our business and supply chain by introducing a Supplier's Code of Conduct and setting up enhanced due diligence processes for any suppliers, business partners or vendors who are identified as high risk.

Our organizational structure, our business, and our supply chains

Tekion is a transformative force in the automotive industry, offering a comprehensive, cloud-native suite of platforms that unifies the entire automotive retail journey. Tekion's platform suite includes the Automotive Retail Cloud (ARC) for retailers, the Automotive Enterprise Cloud (AEC) for manufacturers and large enterprises, and the Automotive Partner Cloud (APC) for technology and industry partners, and Tekion AI – a suite of purpose-built AI offerings launched in 2026. By leveraging advanced AI, machine learning, and sophisticated data analytics, the Tekion platform connects all stakeholders-OEMs, retailers, and consumers – creating a seamless, modern, and efficient digital experience across the automotive ecosystem.

Tekion Corp. is the ultimate parent company of Tekion. This statement covers the following companies within Tekion (collectively, the "**Tekion Group**"):

Company	**Jurisdiction**
Tekion Corp	United States
Tekion India Private Limited	India
Tekion Canada ULC	Canada
Tekion UK Limited	United Kingdom
Tekion Germany GmbH	Germany

Tekion is headquartered in Pleasanton, California, United States of America and operates globally. Tekion employs approximately 3,100 people worldwide and engages 260 contractors across the globe – with most of these contractors engaged through established consultancy

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companies in the United States of America and India. Tekion has operations in North America, Europe and India and sources goods and services from companies across the globe.

Tekion's business operating model is as follows:

Tekion is a technology company that delivers cloud-based Software as a Service (SaaS) and AI solutions for the automotive retail sector. Its business serves automotive dealerships and dealership groups by providing innovative platforms and products that streamline and automate critical business functions. Tekion's business model is anchored in three integrated platforms and newly introduced AI offerings:

- **Automotive Retail Cloud (ARC):** A comprehensive dealer management system that unifies dealership operations across sales, finance, inventory, accounting, service, and customer relationship management.

- **Automotive Enterprise Cloud (AEC):** A suite designed to address the enterprise-scale needs of multi-rooftop automotive groups, offering centralized control, advanced analytics, and broader integrations across multiple store locations.

- **Automotive Partner Cloud (APC):** A platform that enables efficient collaboration, integration, and connectivity between dealerships and their key business partners, such as service providers, lenders, and third-party vendors.

- **Tekion AI:** A suite of purpose-built AI offerings, leveraging generative and predictive models trained on real dealership workflows, which can be integrated into Tekion's ARC platform or utilised separately.

Tekion's main sources of revenue are subscription fees for its software platforms, one-time charges for implementation and onboarding of such platforms, professional services, sales of value-added modules and integrations, and transactional or API-related service fees. Customers consist predominantly of franchise and independent automotive dealerships, multi-rooftop dealer groups, and, in some cases, related automotive service providers. End-users include dealership staff across a range of professional functions, with some platform features also accessible to automotive consumers via digital portals.

Tekion's internal operations are focused on software development, customer support, training, and service delivery, with a workforce composed primarily of professionals in knowledge-based roles. We do not engage in manufacturing or large-scale manual labour and have a limited procurement footprint, mainly purchasing IT solutions for internal business use and contracting with third-party vendors for technology or integration services.

Our key supply chains include the procurement of cloud & AI infrastructure services, implementation & IT outsourcing services, and operational data streams from OEMs, finance & insurance providers, and other third-party data providers. We also engage with providers of associated services in several different jurisdictions, such as consulting firms in the US or implementation companies in other jurisdictions, who help customers of Tekion implement our platforms. We also have fee sharing arrangements in place with certain third-party companies who are introduced to customers via Tekion's platforms.

As well as relationships with suppliers, we engage established third-party consulting and professional services firms and established Employer of Record companies to provide engineering, implementation support, and staff augmentation services. These third-party consulting and professional firms are headquartered in the United States of America and India. The Employer of Record companies serve as employer of record for contractors in The Philippines, Austria, and Israel.

Our policies in relation to slavery and human trafficking

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As part of our commitment to combatting modern slavery and human trafficking, we have implemented and are guided by the following existing policies, which provide a foundation as we develop more specific procedures:

Business Conduct Guidelines

Tekion has in place Business Conduct Guidelines that require our employees to conduct business fairly, openly and responsibly and to respect the human rights and dignity of others. The Business Conduct Guidelines also require employees to carry out business in accordance with applicable laws, rules and regulations and to conduct themselves with honesty, integrity and in an ethically appropriate manner. Tekion actively encourages any of its employees who become aware of any violation of these Business Conduct Guidelines to report them to their line manager, the People Team or anonymously via Tekion's anonymous hotline.

Whistleblowing policy

Tekion also has in place a whistleblowing policy which sets out the process for our employees to anonymously raise any concerns they may have in relation to compliance with our legal obligations, which provides a mechanism to report concerns related to modern slavery and human trafficking, and to ensure that there is adequate protection for employees who make protected disclosures. Tekion will not tolerate retaliation against, or victimization of, those who blow the whistle in good faith to identify concerns with its working practices, or those of its suppliers and other stakeholders.

Modern slavery and anti-human trafficking policy

Tekion adopted, as of 15 April 2026, an anti-slavery and human trafficking policy embodying a zero-tolerance approach to all forms of modern slavery – including slavery, servitude, forced or compulsory labour, and human trafficking – across the Tekion Group and all countries in which it operates. The policy applies to all individuals working at any level or grade, including employees, contractors, consultants, agents, and business partners, each of whom is required to read, understand, and comply with its terms, avoid any activity that might constitute or suggest a breach, and take personal responsibility for the prevention, detection, and reporting of modern slavery in any part of the business or its supply chains.

Concerns or suspicions may be raised with a line manager, a member of the legal team, or via Tekion's dedicated confidential reporting hotline at app.mycompliancereport.com, with protection afforded to anyone who raises a genuine concern in good faith. The policy further requires that Tekion's zero-tolerance approach be communicated to all suppliers, contractors, and business partners at the outset of any business relationship and reinforced on an ongoing basis. Any employee found to be in breach of the policy will face disciplinary action, up to and including dismissal for gross misconduct, and Tekion reserves the right to terminate its relationship with any non-employee individual or organisation in breach without compensation.

Introduction of this policy was one of Tekion's proposed steps from the financial year ended 31 December 2024 ("**FY 2024**") and its adoption showcases Tekion's strong commitment to ensuring modern slavery and human trafficking has no place within its business or supply chains.

Our due diligence processes

Our current business processes provide a foundation for due diligence and assist us in identifying, assessing and monitoring potential areas of risk within our supply chains.

Contracts with third party suppliers, business partners or vendors of Tekion go through several review stages before a contract is entered into (e.g. financial, information security, legal and privacy approvals). In FY 2025, Tekion's legal team worked closely with the procurement team to strengthen due diligence procedures and to ensure that the procurement team is aware of common warning signs associated with modern slavery and human trafficking, and that these are appropriately investigated before any procurement decisions are made.

In FY 2025, Tekion also introduced a requirement for all new contracts entered with suppliers and business partners to contain a clause which required suppliers and business partners to obey applicable laws and regulations that require them to treat workers fairly and provide a safe and healthy work environment.

We are continuing to monitor these processes to identify and assess further adaptations that can be implemented to continue to minimise modern slavery and human trafficking risks in our business and supply chain.

As part of our current risk management practices, we only employ agency workers through reputable employer of record companies or employment agencies in jurisdictions where we use agency workers.

Assessing and managing risk

Tekion regularly takes steps to identify the areas of its business and its supply chains that are most at risk in relation to modern slavery and human trafficking. Given our technology-focused, knowledge-worker business model and software development operations, we recognize that our risk profile differs from manufacturing or labour-intensive industries, while maintaining vigilance regarding our global supply chain relationships.

While further processes are being developed to assist in the identification of areas of risk in Tekion's business and its supply chains, Tekion relies on the steps noted above in relation to due diligence and works to ensure compliance by its employees and suppliers, contractors and business partners with the policies set out above.

Training

From 15 April 2026, Tekion has introduced compulsory modern slavery and anti-human trafficking training for all employees. All existing and newly onboarded employees will receive training to help them recognise environmental, health, safety, and labour/worker concerns, including issues relating to slavery, human trafficking, and forced labour. The training also provides details of reporting channels for raising suspicions of improper conduct within Tekion's business or wider supply chain and explains how Tekion will investigate such suspicions.

Introduction of this training was a proposed step from FY 2024, further exemplifying the seriousness with which Tekion approaches the combatting of modern slavery and human trafficking in its business and supply chain.

Our effectiveness in combating slavery and human trafficking

Following a review of the steps taken in FY 2025 and prepared for implementation in FY 2026, and having completed the due diligence strengthening, contract clause introduction, policy adoption, and training initiatives described above, we intend to take the following further steps to combat slavery and human trafficking and to ensure there is no modern slavery or human trafficking in our business and supply chains:

- Introduction of a global Supplier's Code of Conduct to be shared with current and new suppliers, business partners, and vendors, who will be expected to sign and return it on an annual basis, confirming their continued adherence to the minimum standards required to continue doing business with Tekion. The Supplier's Code of Conduct will, amongst other things, contain provisions in respect of modern slavery, human trafficking and forced labour and detail what steps will be taken by Tekion in the event of a breach by a supplier, business partner or vendor of the requirements of the Supplier's Code of Conduct; and

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- Setting up enhanced due diligence processes for any suppliers, business partners, or vendors identified as high risk (such as those located in, or providing services or goods from, elevated forced labour risk countries).

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Tekion's slavery and human trafficking statement for the financial year ending 31 December 2025.

Jay Vijayan
Chief Executive Officer

Signed by:
Jay Vijayan
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Signature of Director of Tekion Corp.
For and on behalf of the Tekion Group

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