



TCR - Slavery and Human Trafficking Statement

This Statement is made on behalf of TCR International N.V. and its affiliated companies, including TCR UK Limited, Technical Maintenance Solutions UK Limited, Envol Investment Limited and TCR GSE Australia PLY LTD (collectively referred to as “**TCR**”), and pursuant to Section 54 of the UK Modern Slavery Act 2015 and Section 16 of the Modern Slavery Act 2018 of Australia.

References in this statement to “**we**” or “**our**” are references to TCR. This Statement relates to the financial year ending on June 30th, 2025.

Our organisation and our business

TCR is a leading provider of a comprehensive range of ground support equipment (“**GSE**”) and services that supports customers such as handling companies, catering companies, airlines, airports and cargo handlers, in a vital aspect of their ground handling processes: the use and operation of their GSE. This includes offering expertise in GSE rental, GSE fleet sale and rent-back, GSE repair and maintenance, ramp assistance and sale of second hand or pre-used GSE.

We are headquartered in Belgium and have affiliated companies across Europe, as well as in the US, Middle East, Australia, India and Asia Pacific, with operations in more than 230 airports.

Our people

TCR currently employs approximately 2,000 staff worldwide. Most of our workforce comprises highly-trained technicians that are skilled in mechanics and electronics, and are directly responsible for GSE maintenance in more than 100 workshops at airports.

We expect all our employees to be treated with respect. Human Resources practices are set in place to ensure wellbeing at work, while protecting the health and safety of all our employees.

Our policies and actions regarding slavery and human trafficking

TCR recognises modern slavery as a criminal offence and a serious violation of fundamental human rights. We are firmly committed to supporting and upholding the principles enshrined in the Universal Declaration of Human Rights and the International Labour Organization Conventions, as reflected in our Code of Conduct and Human Rights Policy.

TCR maintains a zero-tolerance approach to all forms of forced labour, slavery and human trafficking. We do not tolerate such practices within our operations or across our value chain, including employees, customers, suppliers, GSE users, shareholders and other stakeholders.

Our supplier contracts explicitly prohibit the use of child labour and forced labour and require compliance with international human rights standards.

As reaffirmed in our 2025 Sustainability Report, TCR is committed to promoting integrity, respect and ethical conduct in every country where we operate. Integrity is a core company value and a key criterion in our recruitment, performance evaluation and daily conduct.

Through our Code of Conduct, we require all individuals and entities acting on behalf of TCR to comply with applicable laws, ethical standards and our internal policies. We actively encourage employees to report any concerns, including those related to modern slavery or human trafficking, via our Whistleblowing Policy, with the assurance of protection from retaliation.



Our supply chain and assessed risk areas

TCR incorporates its Supplier Code of Conduct into all supplier agreements as a contractual obligation. New suppliers receive this document during onboarding and are explicitly informed that TCR will not engage with any party that fails to uphold ethical business practices or address risks related to modern slavery and human trafficking within their operations or supply chains.

All supplier agreements include sustainability provisions, which enable TCR's procurement team to collect relevant data and monitor supplier contributions toward key regulatory and ESG reporting obligations, such as Streamlined Energy and Carbon Reporting. These provisions cover a broad range of areas, including workplace safety, waste reduction and environmental stewardship, diversity and inclusion in recruitment, cybersecurity and data protection, and a clear delegation of authority and governance standards.

In FY25, TCR worked with over 5,000 suppliers, primarily in support of its core operations involving ground support equipment (GSE) sales, leasebacks, and spare parts. Our supplier base and customer network are composed largely of well-established global companies known for high service standards and strong compliance cultures. These partners are expected to maintain safe, respectful, and fair working environments for both their employees and those of their subcontractors and supply chain partners.

A significant majority of TCR's supply chain expenditure in FY25 occurred in countries assessed as low risk for modern slavery. Approximately 90% of total procurement spend took place in countries rated "BB" or higher in the Global Slavery Index 2023 in terms of government response. Engagements in higher-risk jurisdictions—such as China or Malaysia—were limited and typically involved local subsidiaries of multinational companies with mature compliance programs and established ethical frameworks.

Operating within the highly regulated aviation sector, TCR's supply chain is subject to strict security protocols and professional standards. Personnel are generally required to undergo background checks and hold advanced technical or industry-specific qualifications. This regulatory environment further reduces the likelihood of exploitation or trafficking risks within our operations.

As part of our due diligence process, TCR (i) verifies whether suppliers are subject to statutory modern slavery disclosure requirements, and (ii) requests formal confirmation of compliance with the TCR Supplier Code of Conduct where no public statement is available.

These steps form a core component of our supplier risk assessment framework and help ensure continued compliance with international obligations related to forced labour, human trafficking, and child labour.

The Procurement Department at TCR is responsible for leading the identification, assessment, and response to modern slavery risks within TCR's supply chain. This includes conducting supplier risk assessments, managing the supplier qualification process, and ensuring that all suppliers comply with TCR's Supplier Code of Conduct and relevant legal requirements. This Department is also tasked with ongoing monitoring and escalation of any identified risks or incidents related to modern slavery.

TCR's governance structure for modern slavery and human trafficking risk management is overseen at the senior level by the Board of Directors. The Legal & Compliance team and Internal Audit jointly manage governance, providing independent oversight of the effectiveness of policies, procedures, and risk management activities. Legal ensures compliance with all applicable laws and internal policies, while Internal Audit conducts periodic reviews and audits of the Procurement Department's processes and controls related to modern slavery risk. Findings and recommendations are reported to the Board to ensure continuous improvement and accountability.

Information-Gathering Process and Data Quality

In preparing this statement, TCR consulted with its owned and controlled entities through a coordinated information-gathering process led by the Legal & Compliance and Procurement teams. Relevant subsidiaries provided input on their



local operations, suppliers and risk assessments, supported by senior management in each jurisdiction. This approach ensures that the statement reflects the practices and risk profile of the entire TCR Group

The preparation of this Modern Slavery and Human Trafficking Statement is underpinned by a structured information-gathering process, utilizing data for the previous twelve-month period from multiple internal sources:

- *Purchasing data for subcontractors, consumables, and spare parts* is sourced from EIS Cube 3.0 – Inventory (based on SAP data). Responsibility for the quality and accuracy of this data lies with the Operations (OPS) Department.
- *Purchasing data for GSE CAPEX* is sourced from EIS Cube 3.0 – Fleet (based on SAP data). Responsibility for the quality and accuracy of this data lies with the Asset/Fleet Management Department.
- All purchasing data is linked to a fixed supplier.
- Spend by country of origin is calculated and mapped to the latest Global Slavery Index results to assess risk levels (Low, Medium, High).

TCR acknowledges that the current supplier–country of origin mapping process may not capture all instances where goods are produced or shipped from countries other than those indicated in the mapping table. Addressing this limitation is a priority for future process improvements to ensure more accurate risk identification.

Awareness and Communication

Although TCR is not aware of any instances of modern slavery within its operations or supply chain, we have established a framework for addressing any concerns that may arise. This includes investigating reported or suspected cases, working with suppliers to implement corrective action plans, supporting affected workers where appropriate and escalating issues in line with our Whistleblowing Policy and contractual rights. Where a supplier fails to take adequate steps to remediate identified issues, TCR reserves the right to suspend or terminate the relationship.

We are enhancing internal awareness, particularly among procurement and HR staff, through targeted training on TCR's International Code of Conduct, Human Rights Policy and Anti-Bribery and Corruption Policy. These efforts support a strong compliance culture across the organisation.

In line with our 2025 Sustainability priorities, the TCR Board has identified responsible procurement as a strategic focus area. As such, we are strengthening vendor due diligence and implementing a structured vendor risk assessment process. This covers not only modern slavery and human trafficking risks, but also broader sustainability considerations.

Our Supplier Code of Conduct is central to this approach and sets clear expectations regarding human rights and ethical conduct. We expect all suppliers to comply with both the letter and spirit of our Code of Conduct and Human Rights Policy.

TCR assesses the effectiveness of its actions to address modern slavery risks through several mechanisms. These include regular reviews of supplier due diligence outcomes, internal audits of procurement and risk management processes, tracking of compliance training completion for employees involved in procurement and Human Resources, and an annual review of our Code of Conduct and Human Rights Policy. Key findings and recommendations are reported to the Board, allowing us to evaluate progress and identify areas for further improvement.



TCR Commitment

We continuously assess the effectiveness of our policies and procedures to combat modern slavery. Our 2025 Sustainability Report reaffirmed our ongoing commitment to responsible business conduct and human rights protection across all the jurisdictions in which we operate.

This statement has been approved by the Board of Directors of TCR and will be reviewed and updated annually, in line with our legal obligations.

Tom Bellekens
Executive Chairman
TCR International N.V.

Jason Watson
CEO
TCR International N.V.

December 5th, 2025

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A handwritten signature in black ink that reads "Tom Bellekens".
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A handwritten signature in black ink that appears to be "J. Watson".
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