

1) INTRODUCTION

This statement is made by INIT Innovations In Traffic Systems SE in accordance with Section 54 of the Modern Slavery Act of 2015 on behalf of it and its UK subsidiary, and sets out the actions taken by the init Group in preventing and combating slavery and human trafficking in its supply chain and businesses in the 2024 financial year.

Across the entire Group, init maintains a zero-tolerance approach towards modern slavery or human trafficking. Through this Statement, init reaffirms its commitment to upholding fundamental human rights and resisting any form of forced labour.

2) OUR BUSINESS

Since 1983, init has evolved from a university spin-off to a world market leader for ITS solutions in public transportation. Everything we do is based on our objective to be the most innovative, reliable and sustainable supplier. Our head office is in Karlsruhe, Germany, but we have global presence to provide our customers with a first-class service. We hold more than 30 subsidiaries and offices around the globe, including Canada, the USA, Singapore and the UAE.

init is a worldwide leading supplier of integrated planning, dispatching, telematics and ticketing systems for buses and trains. For 40 years, init has been assisting transport companies in making public transport more attractive, faster and more efficient.

init concedes that there is a tentative risk of slavery and human trafficking occurring within its business and supply chain, and is committed to taking steps to prevent this.

This statement applies to all companies within the init Group.

The full company structure can be found under:

https://www.initse.com/fileadmin/user_upload/Content/2_Company/1_Organization/INIT_Organigramme_en.pdf

3) OUR SUPPLY CHAIN

In carrying out its business init relies on a large network of suppliers and works with a wide variety of subcontractors. init's suppliers come from different sectors/branches of industries, such as electronics, manufacturing and services.

INIT's ethical guidelines also apply to its suppliers, obliging them to respect human rights, among other things.

4) POLICIES AND DUE DILIGENCE PROCESSES

init believes in its responsibility to respect human rights and has explicitly integrated this into its Ethical Guidelines, which are the principles by which we conduct out business. The Ethical Guidelines can be downloaded from the init website:

https://www.initse.com/fileadmin/user_upload/Content/PDFs/Ethical_Guidelines_en.pdf

init also expects its suppliers and subcontractors, as well as all business partners, to act in accordance with these guidelines.

To identify and mitigate risk, init has implemented the following measures in its supply chain, which are reviewed on a regular basis:

- init is committed to minimum labour conditions in its supply chains, including the prevention of slavery and human trafficking.
- In init's General Terms and Conditions of Purchase, init requires compliance with applicable laws, regulations and guidelines. Furthermore, suppliers are requested to comply with init's Ethical Guidelines and to ensure that they are also enforced with its suppliers
- The Modern Slavery Act is referenced in init's General Terms and Conditions of Purchase to emphasize the importance for the company to respect human rights. init's objective is to maintain and continue to establish ethically, morally and legally irreproachable conduct in all areas of the company.
- Each new employee is made aware of the Ethical Guidelines and Codes of Conduct and is required to follow and abide by them. In addition, all employees are regularly informed about init's Ethical Guidelines and trained on them at least once a year, via communication media such as intranet, emails, meetings or a training tool and thus kept in the employees' minds.
- init's Managing Board maintains an active exchange with the management of all the consolidated companies. Several times a year, the Managing Board members meet with the managing directors of the group companies in physical or other form. General compliance topics, and the Code of Conduct in particular, are regularly brought to the attention of management in these interactions, in order to establish it further amongst the group companies and their employees.
Further, in order to ensure compliance within the whole init group, at the end of each reporting year, the management teams of the respective entities submit a summarised report of any (suspicious) cases and how these were handled as well as a summary of the preventive measures carried out and any new preventive measures.
- An online-whistleblowing system has been established on init's website through which employees as well as customers, business partners and third parties can anonymously or not report possible violations of applicable law or corporate principles. The system is accessible to everyone and init encourages anyone—employees, suppliers, and external stakeholders—to report suspicious activities or potential breaches of init's ethical standards.
- init's Supervisory Board has constituted an Audit Committee that advises the Managing Board on compliance issues at regular intervals and reports to the full Supervisory Board.

5) TRAINING

At init, we want to create an environment in which employees can reach their full potential to establish and expand the specific competencies that are required to implement and respect our corporate strategy and objectives. As part of this, upon joining the company, every employee undergoes a 6 to 12-week orientation and training program. One of the main topics is to communicate init's values, particularly the Ethical Guidelines and Codes of Conduct, for which we have established an e-learning module for our employees.

6) HYBRID WORKING MODELS

init offers its employees to use hybrid working models with flexible working hours with a mix of remote working and home working within the country of employment. With this working model and flextime models, we are accommodating our employees' desire for greater flexibility as well as the operational requirements to also have some presence in our offices. We particularly want to promote creative processes and strengthen employee communication and connection with the company through personal interaction. In this hybrid working model, we combine the advantages of mobile working with those of close interaction in the office.

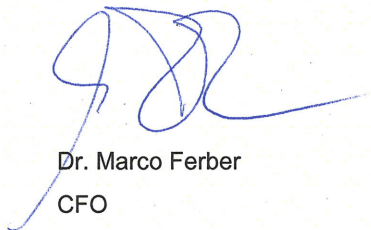
7) NEXT STEPS

We recognise that the fight against slavery and human trafficking is an ongoing process. Accordingly, we are continuing to carry out and refine existing and new measures, including for the following financial year:

- Carry out internal reviews to assess the success of our current measures and analyse what other steps could be taken.
- Updating Supplier Questionnaires
- Extension of mandatory trainings
- Continuous review and update of policies

We will continue to monitor the Group's supply chain to assess ongoing risks and develop measures to further reduce the risk of slavery and human trafficking taking place in the Group's supply chain and/or businesses.

April, 2025



Dr. Marco Ferber
CFO



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