

GEOTAB REPORT

Modern slavery statement

Financial year 2025

GEOTAB

Introduction from our Board of Directors

Geotab is committed to ensuring that we have a strong, resilient supply chain that upholds international human rights and labor standards. We recognize our opportunity and responsibility to ensure our supply chain does not engage in or facilitate modern slavery or human trafficking. We maintain and continuously implement proportionate, risk-based systems and controls designed to ensure modern slavery is not taking place in our own business or in our supply chains with our knowledge, while maintaining our drive to employ a diverse population of employees and, where possible, doing what we can to provide meaningful employment opportunities to underserved communities through strategic partnerships and other means.

This report sets out our global practices, policies and business processes to identify and address risks related to modern slavery in our operations and supply chain.



Organizational structure and operations

Geotab Inc., an Ontario corporation (collectively, "**Geotab**", "**we**", "**our**" throughout this report), is a multinational organization with subsidiaries and affiliates located in various jurisdictions around the world. Established in 2000, Geotab is an international business-to-business internet-of-things solutions provider. We design and manufacture components which improve the safety of our roads, protect people, add value to and improve the performance of our customers' assets by providing industry-leading insights through data analytics and the cloud.

Headquartered in Oakville, Ontario, Canada, Geotab operates globally and employs over 3,000 people globally. More information about Geotab can be found on our **website**.



Our business

Geotab is a global leader in connected transportation solutions.

We provide fleet management and telematics — vehicle and asset tracking — solutions to approximately 100,000 global customers.

For more than 25 years, we have invested in ground-breaking data research and innovation to enable partners and customers, including Fortune 500 and public sector organizations, to transform their fleets and operations. With over 5 million subscriptions and processing more than 100 billion data points a day, we help customers make better decisions, increase productivity, have safer fleets, and achieve their sustainability goals.

Geotab's open platform and the Geotab Marketplace offer hundreds of third-party solution options. Backed by a team of industry-leading data scientists and AI experts, Geotab is unlocking the power of data to understand real-time and predictive analytics — solving for today's challenges and tomorrow's world.



Policies and commitments

Geotab prioritizes responsible business practices, ensuring ethical conduct and integrity in all our business interactions, while also expecting the same from our supply chain partners.

Our policies align with international standards for human and labor rights. We implement our responsible supply chain standards through global policies designed to reduce the risks of modern slavery.

Geotab's key policies specifically addressing forced labor and child labor include: (i) the Global Partner Code of Conduct, which explicitly prohibits Partners from engaging in involuntary labor, child labor, sex trafficking, and any form of slavery or trafficking of people, and which applies to all Partners doing business with Geotab worldwide; (ii) the Employee Code of Conduct, which sets out ethical standards applicable to all employees, contractors, interns, consultants and part-timers, including prohibitions on modern slavery; and (iii) Geotab's Plan for Combating Trafficking in Persons, which establishes a comprehensive compliance framework covering prohibited conduct, employee training, due diligence processes, reporting mechanisms, and remediation procedures.

It is a primary responsibility of the board of directors of Geotab and its senior management team - including our Chief Operations Officer and our Vice-President, Operations - to maintain close relationships with strategic suppliers who share our values regarding human rights, ethics, health and safety, and the environment. As a participant of the **UN Global Compact**, Geotab is committed to addressing human rights, labor, environment and anti-corruption through its operations.



Our suppliers

Geotab is committed to transparency, treating all people with respect and dignity, ensuring safe working conditions and conducting environmentally responsible and ethical operations.

We expect Partners and our supply chain, and their Partners at all tiers, to embrace our social, environmental and ethical responsibilities with equal enthusiasm for transparency. As such, Geotab's **Global Partner Code of Conduct** sets standards designed to protect the health, safety, and treatment of workers, including the prohibition of involuntary labor, sex trafficking, and slavery or trafficking of people.

This Global Partner Code of Conduct applies to any Partner doing business with Geotab worldwide. For this purpose of this policy, "Partner" refers to any person or entity with a business relationship with Geotab, including those that provide goods or services to Geotab, regardless of the type or absence of compensation for such goods or services, those who act as resellers of Geotab products and services, and those who otherwise participate in the Geotab products and services ecosystem (e.g., Geotab Marketplace Partners). "Worker" refers to any person a Partner compensates in any form or manner in exchange for performing labor or any other work.

Our employees

Geotab requires all of its employees, including contractors, interns and part-timers to take ethics and compliance training.

This training is mandatory for all employees and is designed to reinforce the importance of ethical behavior and adherence to our Code of Conduct within our global organization.

The training requires each participant to review, attest to, and uphold Geotab's Code of Conduct, which includes modern slavery. Employees are encouraged to report any misconduct through the appropriate channels.



Our supply chains

Geotab generates revenue primarily from the sale of telematics devices and related subscription services that enable access to collected data points relative to a company's fleet and drivers.

Our anti-modern slavery efforts require strong collaboration and engagement with our global suppliers that manufacture products or provide services on our behalf. In 2025, the majority of Geotab's components originated from Taiwan, China, Malaysia, Philippines and Japan; hardware products were manufactured in Taiwan, Canada and Mexico.

Geotab assesses supply chain risk with particular consideration to countries that rank poorly on Transparency International's Corruption Perception Index, as corruption risk is closely correlated with weak labor law enforcement and elevated modern slavery risk. Source countries for Geotab's hardware and component supply chain are evaluated against this and similar country-level risk indicators. Where relevant, Geotab also considers sector-specific risk factors in its supply chain risk assessment, with further development of sector-level methodology planned for future reporting cycles.

Due diligence

As part of our initiative to identify and mitigate modern slavery risk, we continually review and enhance our processes in order to identify risks as changes occur within the supply chain and as new products are introduced. We conduct due diligence on both direct and indirect suppliers. We continue to actively implement and refine our due diligence program, ensuring that it remains effective in addressing evolving risks within our supply chain.

Geotab requires direct suppliers and partners to attest to our Supplier Code of Conduct, which incorporates compliance with applicable laws on modern slavery, forced labor, and human trafficking. We hold contractual audit rights under our Partner Code of Conduct and Supplier Terms and Conditions, which may be invoked as part of the remediation process where a supplier is identified as high-risk through Geotab's due diligence screening. Geotab also performs risk-based monitoring of subcontractor compliance in connection with applicable U.S. government contracts. In addition, we regularly visit our contract manufacturing facilities to meet with our manufacturing partners to review ongoing operations.

Geotab conducts risk-based due diligence commensurate with the nature and extent of its business relationships. Supply chain verification activities include a review of higher-risk suppliers' names against the US Office of Foreign Assets Control and sanctions lists. While Geotab has not had any reported instances of forced or child labor within its activities or supply chains, any reported labor-related red flags observed in-person during facility visits or in publically-available reports would be promptly investigated.

Although no red flags have been discovered to-date, we have established processes in place to conduct extensive and documented follow-ups to address any reported modern slavery-related issues. Escalation to Geotab's Legal team is to be triggered where an entity is found to have: (i) presence on any modern slavery-related list or watchlist maintained by an international body or government; or (ii) evidence of past or ongoing regulatory or legal actions related to human rights or labor law violations indicative of modern slavery practices. In certain cases, we may decide to no longer pursue a relationship or to terminate our current relationship with a supplier.



Addressing risks

Education & awareness

Our Global Code of Conduct, which includes prohibitions on modern slavery (along with our core values of integrity and ethics), is circulated to staff at the time of onboarding, then annually thereafter. Training is offered via web learning and can be offered in person (upon request) so that it is available at any time.

Reporting

We offer multiple reporting options to stakeholders, both internally and externally to our partners, suppliers, customers, employees, etc. This includes a helpline that gives callers an option to report concerns anonymously. We promote these reporting options through our internal policies, communications, and training. We also have a policy prohibiting retaliation for raising concerns, priding ourselves on being a highly transparent company.

In 2020, we launched an Integrity Helpline in all the countries where we have staff residing, available in the relevant local languages. The Helpline is anonymous, and allows for the caller to follow up on their report as needed. If modern slavery concerns are raised, our Compliance Team will coordinate with appropriate stakeholders to investigate the issue. If our investigation substantiates a reported concern relating to a supplier, the corrective approach may include engaging with the supplier to ensure that the issue is addressed. Where that may not be possible, we reserve the right to terminate the supplier. Through providing this report and the actions, commitments, and representations made herein, Geotab continues to further its dedication to ensuring that modern slavery and human trafficking are not involved in any part of its operations, partnerships, or organization at large.



Mitigation and remediation

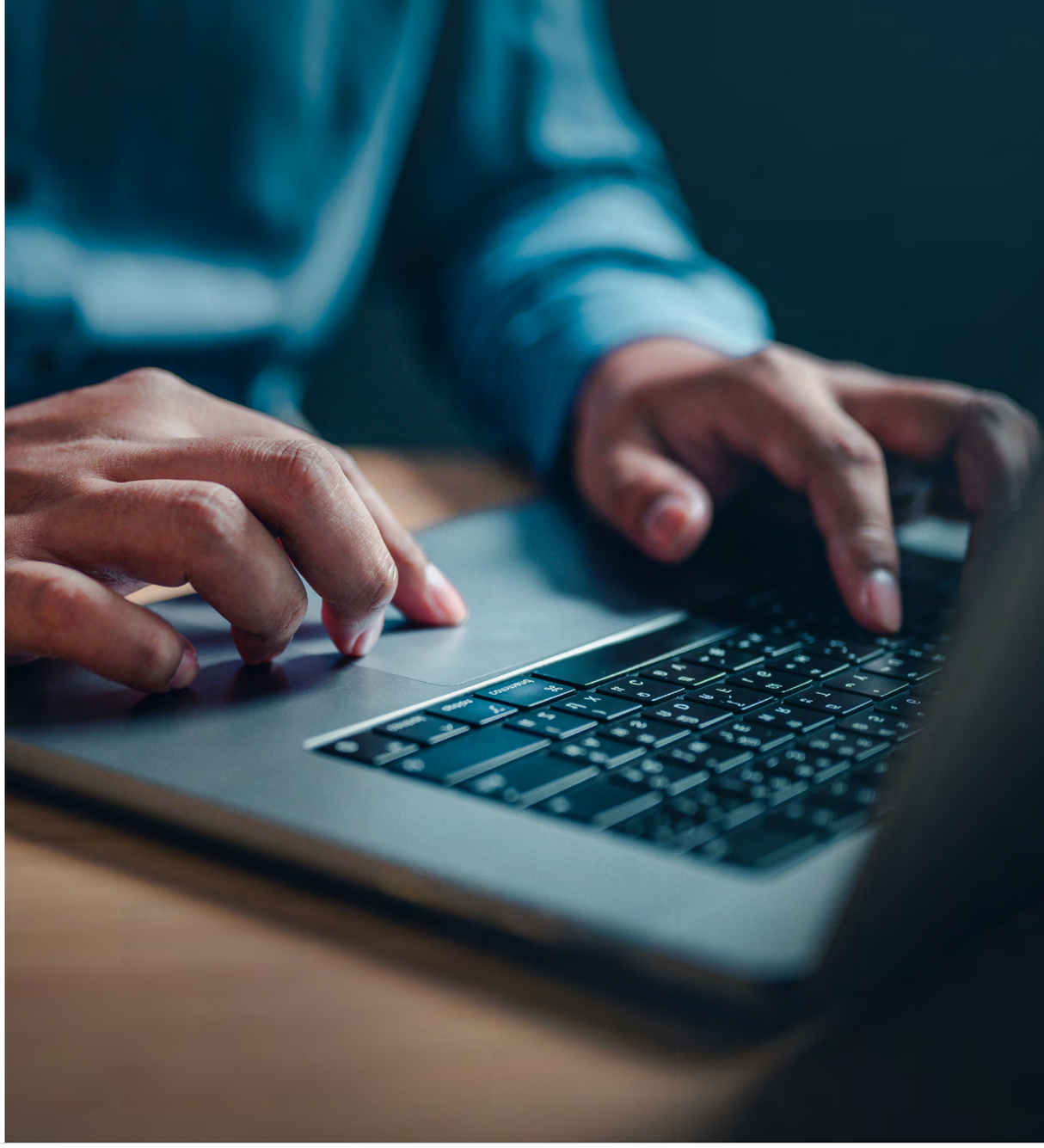
Geotab gathers information on our worker recruitment and maintains internal controls to ensure that all of our workers are recruited voluntarily. Employees and prospective employees apply to posts voluntarily, consent to employment terms, and provide information voluntarily through application questions (e.g., diversity information), with the understanding that not providing this information will not hinder their ability to apply or be selected.

Geotab's Partners are required to agree or adhere to our **Global Partner Code of Conduct** that describes the requirements to maintain a partnership with Geotab. Specific content around labor and human rights outlined in the Code prohibit Partners from engaging in illegal or unethical labor practices.

Geotab leverages Dow Jones as a due diligence tool to screen our value chain against sanctions lists and other official and exclusions lists. Additional screening is completed for sanctions control and ownership, ultimate beneficial ownership and other risk flags that may be a result of forced or child labor or other illicit activities. We also screen for potential adverse media on various topics including social and labor related topics.

If Geotab is apprised of an offense of an organization within our supply chain, an adjudication process will be initiated to mitigate or eliminate risks or infractions within our value chain. Where an instance of forced labor or child labor is identified within Geotab's activities or supply chains, the adjudication process requires the matter to be reviewed by the Legal team, which determines appropriate remediation requirements on a case-by-case basis. Remediation measures may include imposing corrective action plans with defined timelines, invoking Geotab's contractual audit rights under its Partner Code of Conduct and Supplier Terms and Conditions, and, where necessary, terminating the supplier or partner relationship. Employees, contractors, or subcontractors who violate Geotab's anti-forced labor policies may be subject to disciplinary action up to and including termination of employment or contract. Where appropriate and feasible, Geotab will cooperate with efforts to provide assistance to victims of trafficking in persons.

To date, Geotab has not identified instances of forced or child labor within its activities or supply chains that have necessitated the implementation of specific measures to remediate the loss of income for vulnerable families. Consequently, we have not yet had to activate such specific income remediation measures.



Assessment of effectiveness

Geotab assesses the effectiveness of its actions through the following measures: (i) Automated daily monitoring: all vendors and partners onboarded into Geotab's screening system are automatically screened daily through the Dow Jones platform for changes in modern slavery risk indicators, sanctions status, and adverse media; (ii) Reporting and incident tracking: Geotab monitors concerns raised through the Integrity Helpline and other reporting channels, including tracking the number of reports received, investigation outcomes, and time to resolution; (iii) Annual policy review: Geotab reviews its Plan for Combating Trafficking in Persons and related policies at least annually to assess continued effectiveness and incorporate lessons learned; (iv) Training completion monitoring: Geotab tracks completion rates of its mandatory ethics and compliance training program, which includes content on modern slavery, forced labor, and child labor.

We are committed to constantly refining our strategy for eliminating modern slavery from our supply chain, with the details of our ongoing progress outlined in each section of this report.

We will continue to monitor, verify and validate all processes against existing programs and future initiatives.

Approval and attestation

This Statement was approved by the Board of Directors of Geotab Inc., an Ontario corporation, Geotab (UK) Ltd., an England and Wales corporation, pursuant to:

1. Section 11(4)(b)(i) of the **Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act**; and
2. Section 54(6) of the United Kingdom (UK) **Modern Slavery Act 2015**.

Based on my experience, and having exercised reasonable diligence, I attest that the information in this Statement is true, accurate and complete in all material respects for the purposes of the acts listed above, for the financial year ending 31 December 2025.

Geotab Inc.

Signed by:
Neil Cawse
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Neil Cawse,
Director, President and Chief Executive Officer
I have authority to bind the corporation.

GEOTAB (UK) LTD.

Signed by:
Neil Cawse
4DBD3A22BCFD499...

Neil Cawse,
Director
I have authority to bind the corporation.



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