



Modern Slavery Statement FY25

INTRODUCTION

EROAD's FY25 Modern Slavery Statement is made on behalf of EROAD Limited ("EROAD" and together with its subsidiaries, the "EROAD Group") for the financial year ended 31 March 2025, in accordance with the Modern Slavery Act 2018 and with reference to the requirements under the Californian Transparency and Supply Chains Act 2010 and other legislation pursuant to the locations EROAD Group operates within.

This statement was approved by EROAD's Board of Directors (including its subsidiaries) on 9 September 2025.

Susan Paterson
Chair

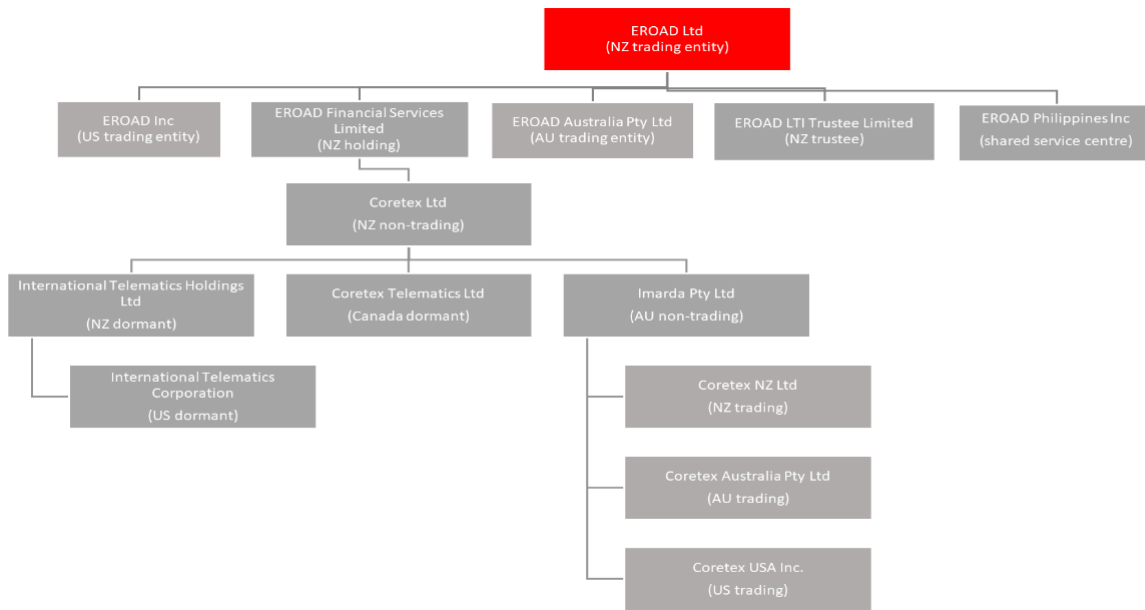
EROAD'S BUSINESS

Introduction

EROAD is a hardware-enabled SaaS company delivering safety, compliance, sustainability and efficiency solutions for vehicles fleets. We are dedicated to upholding human rights across all our business-related activities, in alignment with our core values and purpose. We conduct our business and all our relationships based on integrity and respect.

EROAD's Business Structure

EROAD is a New Zealand public company incorporated in New Zealand and listed on the New Zealand Stock Exchange (NZX) and Australian Stock Exchange (ASX) under the stock symbol of ERD. EROAD's business includes EROAD Limited and all its subsidiary entities. EROAD is headquartered in Auckland and operates across New Zealand, Australia, North America and the Philippines. EROAD owns various subsidiary companies, as follows:



EROAD's Governance Structure

EROAD's Board of Directors is supported by several committees, including the Finance, Risk and Audit Committee ("FRAC"), People and Culture Committee ("PCC"), Nominations Committee ("NC") and Technology Committee ("TC"). The day-to-day management of EROAD is handled by the Executive Team, which is further supported by the Senior Leadership Team. Additionally, various internal staff committees, such as the Sustainability Committee, Safety and Wellbeing Committee and IT Cybersecurity Committee, assist in overseeing specific aspects of the company's operations.

EROAD's Business Operations

EROAD's connected platform, enabled by hardware, is used by commercial and government operators across New Zealand, Australia and North America to manage vehicles, assets and drivers with greater visibility and control. EROAD supports demanding, highly regulated fleet operations, including those moving food, concrete and aggregates, enabling them to operate smarter, safer and more sustainably. EROAD's platform is built on a foundation of regulatory expertise, having delivered the world's first GPS-based road user charging system in New Zealand, where it remains the market leader today.

As at 31 March 2025, EROAD employed 427 people worldwide, known as "EROADers", who are responsible for creating, managing, and developing our software and hardware. They also provide customer service, ensure corporate compliance, and lead our teams. These employees are primarily located in New Zealand, Australia, the United States of America (the USA) and the Philippines.

EROAD's Supply Chain

EROAD's supply chain spans multiple countries, with hardware manufacturing taking place in China, the Philippines, Singapore, Malaysia, Indonesia, and New Zealand. The company operates distribution centres in New Zealand, Australia, and the USA. EROAD employs various freight methods, including road, sea, rail, and air, with air travel being the primary mode for most of its freight. Committed to sustainability, EROAD prioritises refurbishing products wherever possible to manage its supply chain responsibly. Our supply chain relationships include suppliers from various sectors, including information, communications and technology (including hardware, software and electronics), property services (including facilities, utilities, cleaning and waste management), consulting and contracting services (such as human resources, installation, engineering and call centre services), marketing services and office supplies.



RISK MANAGEMENT OF MODERN SLAVERY PRACTICES

Risk Identification

EROAD has a zero-tolerance approach to all forms of modern slavery, including practices akin to slavery and human trafficking within our business. Accordingly, risk assessments have identified the following areas that may pose modern slavery risk:

- Labour risks – these include violations of labour rights, such as forced or compulsory labour, wage underpayment, excessive work hours, debt bondage, and confiscation of personal documents. These also include insufficient grievance mechanisms, discrimination, bullying/harassment, and unsafe or unsanitary working conditions.
- Supply chain risks - EROAD has identified our supply chain as the area with the highest risk of modern slavery practices. The Global Slavery Index highlights Asia as a region with high vulnerability and prevalence of modern slavery. The Index also points out similar risks in the electronics sector and the freight industry, especially shipping.

To date, EROAD has not identified or become aware of any instances of modern slavery practices within our operations or supply chain.

Actions taken to assess and address modern slavery risks

EROAD is committed to preventing modern slavery across all operations, including supply chains, contractors, and third parties.

Our policies, such as the Code of Ethics, Code of Conduct, Diversity and Inclusion Policy, Health and Safety Policy, Whistleblower Policy, Sustainability Policy, and Risk Management Policy, guide our ethical approach within the EROAD Group. A cross-functional team (People & Capability, Operations, Supply Chain, Product, and Legal) ensures these policies are applied consistently.

EROAD applies the same rigorous standards to all entities under its ownership or control, as noted in the Business Structure section of this Statement.

EROAD thoroughly assesses and addresses modern slavery risks within our supply chain through supplier due diligence, self-assessments (via our Sustainable Supplier Questionnaire), and targeted on-site evaluations and audits based on supplier tier and risk. This process includes the following:

- All key suppliers must declare their human rights, labour, health and safety, and wellbeing policies. The intensity of audits and follow-up investigations is based on the supplier's Tier status and any suspicions of altered circumstances.
- EROAD requires suppliers to confirm compliance with fair labour laws. Where concerns arise, we engage to address and resolve them—no corrective actions were required in FY25.

We won't proceed with suppliers if serious issues are found during pre-engagement checks. However, to minimise impact on vulnerable individuals, we aim to work with suppliers to improve conditions where possible rather than cut ties abruptly.

Effectiveness of EROAD's actions

The vast majority of our operations, people, and customers are located in countries with strong labour, employment, and anti-corruption legislation, which means there is a lower risk of modern slavery than may otherwise be the case. As part of our commitment to a zero-tolerance approach and proactive risk management, EROAD regularly reviews its processes to ensure our actions effectively manage modern slavery risks. This includes:

- **Supplier assessments and audits** - In FY25, our Supply Team visited all Tier 1 supplier sites, confirming positive standards and alignment with supplier declarations. Tier 2 suppliers were assessed in FY24, with further site visits scheduled for FY26. These checks are critical for spotting inconsistencies with supplier self-assessments—none have indicated modern slavery to date. If any unsafe or exploitative practices are found, immediate corrective action will be taken.



- **Procurement practices** - EROAD prioritises working with socially responsible and reputable organisations throughout our supply chain. Key procurement requirements are centralised within the business to ensure consistent policy application. Our strong relationships with key suppliers, contractors, and third-party providers enhance our understanding of their business practices and contribute to stronger partnerships.
- **Awareness and Training** - EROAD raises awareness about modern slavery by making the Modern Slavery Statement readily accessible to all relevant stakeholders. This is supported by Board and Executive-level oversight, and training employees across the company on EROAD's Code of Ethics, including periodic campaigns to help employees identify unethical practices within our business and supply chains.
- **Whistleblowing processes** - EROAD has established a reporting mechanism for suspected serious misconduct, including slavery related practices. Concerns can be reported to EROAD's General Counsel, the Chair of the Finance, Risk, and Audit Committee, or anonymously through our Whistleblower facility. This service, managed independently by Deloitte, offers various reporting channels, ensuring confidentiality and integrity in the reporting process.

EROAD'S CONSULTATION PROCESS

All entities owned or controlled as part of EROAD Group operate under a suite of common policies and programs outlined in this Statement. We consult with the Executive team regularly to review and evolve our policies and this statement. EROAD takes a comprehensive and inclusive approach to addressing modern slavery. The Board maintains oversight of non-financial risks, including modern slavery, and is kept informed of key developments and findings through these ongoing reviews.

APPROVAL

This statement is made in accordance with the Australian Modern Slavery Act 2018 and constitutes our Group slavery and human trafficking statement for the financial year ending 31 March 2025. In addition to the approval by EROAD's Board of Directors, this Statement was approved by the Attorney-General's Department on 20 October 2025 and published on the Australian Modern Slavery Statements Register.

Administrative update on 18 December 2025