

Modern Slavery and Human Trafficking Statement

Fiscal year ending 31 December 2025

This statement is made pursuant to the UK Modern Slavery Act. It sets out the steps taken by TrueCommerce, Inc. and its subsidiary group companies, such as TrueCommerce (Coventry) Limited, (together, “TrueCommerce”, “we”, “us” or “our”) during the financial year referenced above to identify and prevent modern slavery and human trafficking in our operations and supply chains.

TrueCommerce is a leading provider of supply chain solutions, including electronic data interchange (EDI), that connect businesses with their trading partners and enterprise systems. TrueCommerce provides its solutions from its offices throughout the world as described on truecommerce.com. This statement applies to TrueCommerce and its subsidiaries.

TrueCommerce has a zero-tolerance approach to modern slavery and human trafficking in all its forms. We are committed to acting ethically and with integrity in our business relationships, and to implementing and enforcing effective controls to guard against slavery and human trafficking taking place anywhere in our business or supply chains.

Supply Chain

Our supply chains support the delivery of our software, services, and internal operations. They include data-center infrastructure providers, software and technology vendors, professional and contract services, telecommunications, and general office goods and services. Based on the nature of our business and the geographies where our suppliers operate, we consider the overall risk of modern slavery within our direct operations to be low.

Policies

We maintain policies that underpin our commitment to preventing modern slavery and human trafficking. These include:

- A Code of Conduct setting out the standards of behavior expected of our people and suppliers.
- A whistleblowing policy that enables employees and third parties to raise concerns confidentially and without fear of retaliation.
- Recruitment and right-to-work procedures designed to ensure that all workers are recruited lawfully and freely.

Due diligence and risk assessment

As part of our efforts to identify and mitigate risk, we:

- Assess modern slavery risk as part of supplier onboarding and periodic supplier review.
- Include contractual provisions in relevant supplier agreements requiring compliance with laws, including the UK Modern Slavery Act, the Australia Modern Slavery Act, and similar laws throughout the world where TrueCommerce operates.

Training and awareness

During new hire onboarding, our people are required to acknowledge and review key policies such as the Employee Handbook and Code of Conduct, which includes expected conduct on modern slavery, anti-discrimination, and anti-harassment. These documents also inform our people on how to report concerns, including anonymously, to management.

Measuring effectiveness

We periodically review the effectiveness of our approach. During the year we reviewed our supplier due diligence process and monitored the number of concerns raised through our whistleblowing channel. We

will continue to make year-on-year progress in maintaining our controls and strengthening where increased risk is identified.

Management Consultation and Approval

This statement is TrueCommerce's modern slavery and human trafficking statement for the financial year referenced at the top of this document. It was approved by the Audit Committee of the Board of Directors of True Commerce, Inc. on 28 July 2026.

Signed:

/s/ Bill Glass

Bill Glass
Chief Executive Officer
For and on behalf of True Commerce, Inc. and subsidiaries
Date: 22 July 2026