

## Modern Slavery Act Transparency Statement

For the financial year ended 31 December 2024

### Opening Statement from Senior Management

Tekion is committed to ensuring that our business and supply chain reflect our values and respect for human rights, a principle we consider fundamental to our risk management strategy and the creation of long-term stakeholder value. As part of this commitment, we are proactively strengthening our practices to combat modern slavery and human trafficking. In the upcoming year, we will enhance our operational integrity by implementing anti-trafficking training and embedding greater due diligence in the management of our supply chain.

### Our organizational structure, our business, and our supply chains

Tekion is a transformative force in the automotive industry, offering a comprehensive, cloud-native platform that unifies the entire automotive retail journey. Tekion’s platform suite includes the Automotive Retail Cloud (ARC) for retailers, the Automotive Enterprise Cloud (AEC) for manufacturers and large enterprises, and the Automotive Partner Cloud (APC) for technology and industry partners. By leveraging advanced AI, machine learning, and sophisticated data analytics, the Tekion platform connects all stakeholders—OEMs, retailers, and consumers—creating a seamless, modern, and efficient digital experience across the automotive ecosystem.

Tekion Corp. is the ultimate parent company of Tekion. This statement covers the following companies within Tekion (collectively, the “Tekion Group”):

Company	Jurisdiction
Tekion Corp	United States
Tekion Digital Processing, Inc.	United States
Tekion India Private Limited	India
Tekion Canada ULC	Canada
Tekion UK Limited	United Kingdom
Tekion Germany GmbH	Germany

Tekion is headquartered in Pleasanton, California, United States of America and operates globally. Tekion employs more than 3,000 people worldwide, has operations in North America, Europe and India and sources goods and services from companies across the globe.

Tekion’s business operating model is as follows:

Tekion is a technology company that delivers cloud-based Software as a Service (SaaS) solutions for the automotive retail sector. Its business serves automotive dealerships and dealership groups by providing innovative platforms that streamline and automate critical business functions. Tekion’s business model is anchored in three integrated platforms:

- Automotive Retail Cloud (ARC):** A comprehensive dealer management system that unifies dealership operations across sales, finance, inventory, accounting, service, and customer relationship management.

- **Automotive Enterprise Cloud (AEC):** A suite designed to address the enterprise-scale needs of multi-rooftop automotive groups, offering centralized control, advanced analytics, and broader integrations across multiple store locations.
- **Automotive Partner Cloud (APC):** A platform that enables efficient collaboration, integration, and connectivity between dealerships and their key business partners, such as service providers, lenders, and third-party vendors.

Tekion's main sources of revenue are subscription fees for its software platform, one-time charges for implementation and onboarding, professional training services, sales of value-added modules and integrations, and transactional or API-related service fees. Customers consist predominantly of franchise and independent automotive dealerships, multi-rooftop dealer groups, and, in some cases, related automotive service providers. End-users include dealership staff across a range of professional functions, with some platform features also accessible to automotive consumers via digital portals.

Tekion's internal operations are focused on software development, customer support, training, and service delivery, with a workforce composed primarily of professionals in knowledge-based roles. We do not engage in manufacturing or large-scale manual labour and has a limited procurement footprint, mainly purchasing IT hardware and SaaS solutions for internal business use and contracting with third-party vendors for technology or integration services.

Our key supply chains include the supply to us of third-party data for use in the development and deployment of ARC, AEC and APC platforms. We also engage with providers of associated services, such as implementation companies in a number of different jurisdictions who help customers of Tekion implement our platforms. We also have fee sharing arrangements in place with certain third-party companies who are introduced to customers via Tekion's platforms.

As well as relationships with suppliers, we engage established third-party consulting and professional services firms and established Employer of Record companies to provide engineering, implementation support, and staff augmentation services.

### **Our policies in relation to slavery and human trafficking**

As part of our commitment to combatting modern slavery and human trafficking, we have implemented and are guided by the following existing policies, which provide a foundation as we develop more specific procedures:

#### *Business Conduct Guidelines*

Tekion has in place Business Conduct Guidelines that require our employees to conduct business fairly, openly and responsibly and to respect the human rights and dignity of others. The Business Conduct Guidelines also require employees to carry out business in accordance with applicable laws, rules and regulations and to conduct themselves with honesty, integrity and in an ethically appropriate manner. Tekion actively encourages any of its employees who become aware of any violation of these Business Conduct Guidelines to report them to their line manager, the People Team or anonymously via Tekion's anonymous hotline.

#### *Whistleblowing policy*

Tekion also has in place a whistleblowing policy which sets out the process for our employees to anonymously raise any concerns they may have in relation to compliance with our legal obligations, which provides a mechanism to report concerns related to modern slavery and human trafficking, and to ensure that there is adequate protection for employees who make protected disclosures. Tekion will not tolerate retaliation against, or victimization of, those who blow the whistle in good faith to identify concerns with its working practices, or those of its suppliers and other stakeholders.

## **Our due diligence processes**

Our current business processes provide a foundation for due diligence and assist us in identifying, assessing and monitoring potential areas of risk within our supply chains. For example, contracts with third party suppliers or vendors of Tekion go through a number of review stages before a contract is entered into (e.g. financial, information security, legal and privacy approvals). We are committed to enhancing these general processes to specifically identify and assess modern slavery risks.

As part of our current risk management practices, we only employ agency workers through reputable employer of record companies or employment agencies in jurisdictions where we use agency workers.

## **Assessing and managing risk**

Tekion regularly takes steps to identify the areas of its business and its supply chains that are most at risk in relation to modern slavery and human trafficking. Given our technology-focused, knowledge-worker business model and software development operations, we recognize that our risk profile differs from manufacturing or labour-intensive industries, while maintaining vigilance regarding our global supply chain relationships.

While further processes are being developed to assist in the identification of areas of risk in Tekion's business and its supply chains, Tekion relies on the steps noted above in relation to due diligence and works to ensure compliance by its employees with the policies set out above.

## **Training**

Tekion will implement training in relation to modern slavery to all heads of department, as well as to our procurement teams, to ensure that modern slavery is not present in our supply chains.


## **Our effectiveness in combating slavery and human trafficking**

As part of our initial compliance framework development to combat modern slavery and human trafficking in our supply chains, we intend to take the following steps to combat slavery or human trafficking:

- Developing and implementing training in relation to modern slavery to all heads of department within the group as well as to our procurement teams over the coming years;
- Developing and introducing a modern slavery and anti-trafficking policy so that employees, contractors and other business partners of Tekion are given guidance on slavery and human trafficking and the measures to be taken by Tekion to tackle modern slavery and human trafficking in its business and supply chains;
- Strengthening the due diligence procedures of Tekion's procurement teams to ensure that the procurement team are giving appropriate considerations to modern slavery and human trafficking in the Tekion's supply chain; and
- Introducing clauses into new contracts entered into with Tekion's suppliers and business partners requiring them to obey laws and regulations that require them to treat workers fairly and provide a safe and healthy work environment.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Tekion's slavery and human trafficking statement for the financial year ending 31 December 2024.

Jay Vijayan  
Chief Executive Officer

Signed by:  
  
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**Signature of Director of Tekion Corp.  
For and on behalf of the Tekion Group**