

Volvo Group North America, LLC  
Arrow Truck Sales, Incorporated  
Mack Trucks, Inc.  
SVO, LLC  
Mack Defense LLC  
Proterra Powered LLC

Report on Measures to Prevent and Reduce the Risk of Forced and Child Labour  
under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

**I. Introduction**

This is the first report for the financial reporting year referenced below of Volvo Group North America, LLC, Arrow Truck Sales Incorporated, Mack Trucks, Inc., SVO, LLC, Mack Defense LLC, and Proterra Powered LLC (collectively below, "VG Trucks US") under Canada's *Fighting Against Force Labour and Child Labour in Supply Chains Act* (the "Act").

**II. VGCI Structure, Activities and Supply Chains**

**a. Corporate Information**

Legal name of reporting entities:  
Volvo Group North America, LLC  
Arrow Truck Sales Incorporated  
Mack Trucks, Inc.  
SVO, LLC  
Mack Defense LLC  
Proterra Powered LLC

Financial reporting year: January 1<sup>st</sup> to December 31<sup>st</sup> 2025

Report version: Original

Corporation Numbers:  
Volvo Group North America, LLC: 2977435 (registration number of their US State of Incorporation (Delaware))  
Arrow Truck Sales Incorporated: 00078474 (charter number of their US home state (Missouri))  
Mack Trucks, Inc.: 608244 (registration number of their US State of Incorporation (Pennsylvania))  
SVO, LLC: 7139113 (registration number of their US State of Incorporation (Delaware))  
Mack Defense LLC: 4937410 (registration number of their US State of Incorporation (Delaware))  
Proterra Powered LLC: 2536422 (registration number of their US State of Incorporation (Delaware))

Business numbers (numbers displayed are Export Identification Numbers or Non-Resident Importer Numbers):  
Volvo Group North America, LLC: 58-2431188  
Arrow Truck Sales Incorporated: 82450 7750 RM0013  
Mack Trucks, Inc.: 22-1582040  
SVO, LLC: 83-458992800  
Mack Defense LLC: 832462634PG0001  
Proterra Powered LLC 93-4129563

Entity category: VG Trucks US are legal entities formed under the laws of the United States, each of whom do business in Canada by exporting goods, produced outside of Canada, into Canada. With respect to the other criteria for determining applicability of the Act to VG Trucks US, each legal VG Trucks US entity has had at least \$20 million in assets for at least one of its last two fiscal years and either generated at least \$40 million in revenue or employed an average of at least 250 employees, or both, for at least one of its last two fiscal years.

Sectors or industries: Manufacturing for all VG Truck US entities other than Arrow Truck Sales Incorporated, which operates in the retail trade.

Headquarters:

Volvo Group North America, LLC: Greensboro, North Carolina, USA

Arrow Truck Sales Incorporated: Kansas City, Missouri, USA

Mack Trucks, Inc.: Greensboro, North Carolina, USA

SVO, LLC: Greensboro, North Carolina, USA

Mack Defense LLC: Allentown, Pennsylvania, USA

Proterra Powered LLC: Burlingame, California, USA

Entity structure: The VG Trucks US entities are corporations and limited liability companies (LLC's) as shown above, formed under the laws of the US states shown above. VNA Holding Inc. is the sole shareholder of Mack Trucks, Inc. and Arrow Truck Sales Incorporated. Mack Trucks, Inc. is the sole member of Volvo Group North America, LLC, SVO, LLC and Mack Defense LLC. Mack Trucks, Inc. is the sole member of Proterra Powered LLC. VNA Holding Inc. is wholly owned by AB Volvo (collectively, with all its subsidiaries and divisions, the "**Volvo Group**"), which is a publicly held company listed on the Nasdaq Stockholm, Sweden stock exchange (STO:VOLV-B) and headquartered in Gothenburg, Sweden. The Volvo Group is one of the world's leading manufacturers of trucks, buses, construction equipment, marine and industrial engines, electric batteries for commercial and industrial uses, and also provides complete financing solutions.

## **b. Activities and Supply Chains**

### **i. Volvo Group North America, LLC**

Volvo Group North America, LLC, d/b/a Volvo Trucks North America is headquartered in Greensboro, North Carolina, USA. Volvo Trucks first entered the North American market in 1959 and has since established itself as an integral part of the North American commercial truck market. Today, Volvo Trucks North America is a market leader on the forefront of electromobility, automation, and connectivity.

The Volvo VNR, VNL, VNX, VHD, and VAH trucks are all assembled in the U.S. at Volvo Trucks North America's New River Valley Plant in Dublin, Virginia, USA, while Volvo Trucks North America's engines are assembled in Hagerstown, Maryland, USA. Volvo Trucks North America is headquartered in Greensboro, North Carolina, USA.

Volvo Trucks North America's supply chain involves a global network of suppliers providing vehicle components and related services both within and outside of North America. Volvo Trucks North America shares a common purchasing function with Mack Trucks, Inc., SVO, LLC, and, with respect to the base truck chassis, Mack Defense, LLC.

### **ii. Arrow Trucks Sales Incorporated**

Arrow Truck Sales Incorporated buys, trades and sells used semi-trucks.

Arrow Truck Sales Incorporated is headquartered in Kansas City, Missouri, USA.

Arrow Truck Sales Incorporated's supply chain is essentially the market of used trucks in the United States, along with a supply base of support services that are largely but not entirely local or regional in nature.

### **iii. Mack Trucks, Inc.**

Founded in 1900, Mack Trucks, Inc. markets and sells its commercial trucks in dozens of countries worldwide. Mack Trucks, Inc. is one of North America's largest manufacturers of heavy-duty trucks, proprietary engines and transmissions. Mack Trucks, Inc. is part of the Volvo Group, one of the world's leading manufacturers of diesel, natural gas and electric trucks, buses, construction equipment, marine and industrial engines.

Every heavy-duty class 8 Mack truck built for the North American market is assembled at its Mack Lehigh Valley Operations facility in Macungie, Pennsylvania, USA. Mack Trucks, Inc's headquarters is based in Greensboro, North Carolina, USA.

Mack Trucks, Inc.'s supply chain involves a global network of suppliers providing vehicle components and related services both within and outside of North America. Mack Trucks, Inc. shares a common purchasing function with Volvo Group North America, LLC, SVO, LLC, and, with respect to the base truck chassis, Mack Defense, LLC.

### **iv. SVO, LLC**

SVO, LLC produces Mack-branded medium duty (Class 6 and 7) commercial trucks for Mack Trucks, Inc., at SVO's assembly plant in Salem, Virginia, USA. Mack-branded medium duty offerings were introduced in February 2020 and entered full production in July 2020. The truck is a short-hood conventional designed for local use, with a day-cab only. SVO, LLC's headquarters is based in Greensboro, North Carolina, USA.

SVO, LLC's supply chain involves a global network of suppliers providing vehicle components and related services both within and outside of North America. SVO, LLC shares a common purchasing function with Volvo Group North America, LLC, Mack Trucks, Inc., and, with respect to the base truck chassis, Mack Defense, LLC.

### **v. Mack Defense, LLC**

Mack Defense, LLC provides high quality equipment, parts, and services to military, federal, and security customers around the world.

Mack Defense, LLC is based in Allentown, Pennsylvania, USA.

Mack Defense, LLC's supply chain involves a global network of suppliers providing vehicle components and related services both within and outside of North America. With respect to its base chassis, Mack Defense, LLC shares a common purchasing function with Volvo Group North America, LLC, Mack Trucks, Inc., and SVO, LLC. Adaptations to that chassis customized to Mack Defense, LLC's military, federal and security customers are sourced typically through local and regional vendors in North America.

#### **i. Proterra Powered LLC**

Proterra Powered LLC designs, manufactures, and sells advanced battery systems and electric vehicle technology for on- and off-highway, industrial, and commercial vehicle applications. Proterra Powered LLC is headquartered in Burlingame, California, USA, with manufacturing operations in Greer, South Carolina, USA.

Proterra Powered LLC's supply chain involves a global network of suppliers providing battery cells, battery management systems, structural components, electronics, and related services and materials. Key supply chain inputs include lithium-ion battery cells, electronic components, and battery pack materials, sourced from suppliers in North America, Asia, and Europe. Proterra Powered LLC operates an independent purchasing function and manages its own supplier relationships through its Supplier Quality organization.

### **III. Volvo Group and VG Trucks US Commitment to Human Rights**

Respect for human rights is fundamental to the Volvo Group and its members, including VG Trucks US. We are committed to respecting internationally recognized human rights.

The Volvo Group and VG Trucks US individually continue to strengthen their human rights work based on international frameworks such as the UN International Bill of Human Rights, the ILO's Core conventions, the UN Global Compact, the UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, and Children's Rights and Business Principles. The Volvo Group and VG Trucks US further recognize that a core tenet of many of these frameworks is tracking and monitoring performance to drive continuous improvement and using experiences as a source of continuous learning.

#### **a. Policies and measures taken to combat forced labour and child labour in supply chains**

As a member of the Volvo Group, VG Trucks US is bound by and adheres to all policies and programs developed by the Volvo Group regarding human rights. The following policies and programs address forced and child labour. With respect to Proterra Powered LLC, which was acquired by the Volvo Group effective February 2024 and is included within VG Trucks US for purposes of this filing, Proterra's compliance with the human rights commitments described in this section is achieved in part through Proterra's own independent policy infrastructure, which reflects substantively equivalent requirements. Where Proterra's implementation of these commitments differs from the mechanisms described below — including with respect to supplier contracting, purchasing processes, and conflict minerals scope — those differences are summarized within each subsection.

## The Volvo Group Human Rights Policy

The Volvo Group [Human Rights Policy](#) states our commitment to respect internationally recognized human rights and to avoid causing or contributing to adverse impacts as stated in the UN Guiding Principles on Business and Human Rights. The Human Rights Policy applies to all Volvo Group entities (including VG Trucks US), employees and others working at its sites. The policy states that the Volvo Group does not tolerate any forms of modern slavery and child labor in our own operations and our supply chain. The Volvo Group Human Rights Policy is publicly available on [Volvogroup.com](http://Volvogroup.com).

In addition to the Volvo Group Human Rights Policy, Proterra Powered LLC maintains its own Code of Conduct, which independently commits Proterra to respecting internationally recognized human rights and expressly prohibits all forms of modern slavery, forced labor, human trafficking, and child labor in Proterra's operations and supply chain.

## The Volvo Group Code of Conduct

As part of its commitment to respecting internationally recognized human rights, the Volvo Group does not tolerate any forms of modern slavery, including forced, bonded or compulsory labour and child labour. This has been an essential part of the [Volvo Group Code of Conduct](#) since 2003. The Code of Conduct applies to everyone who works on Volvo Group's behalf, including full- and part-time employees, consultants, temporary staff, and senior management. Practices that constitute forced labour, including debt bondage, human trafficking, and other forms of modern slavery, are not accepted. The Code of Conduct includes examples of modern slavery-related practices such as confiscation of identity papers or passports, withholding of wages, not conferring an official employment status, subjecting someone to physical and sexual violence, debt bondage, imposing excessive recruitment fees, and restricting people's freedom of movement. The Volvo Group Code of Conduct is publicly available on [Volvogroup.com](http://Volvogroup.com). In addition, Proterra Powered LLC maintains its own Code of Conduct, which applies to all full- and part-time employees, temporary staff, consultants, managers, and boards of directors, and contains substantively equivalent commitments to those in the Volvo Group Code of Conduct, including explicit prohibitions on all forms of modern slavery with the same enumerated indicators. VG Trucks US including Proterra Powered LLC require annual Code of Conduct training for all employees and managers. Employees are required to re-affirm their commitment to the Code of Conduct at the conclusion of each annual training cycle. Proterra Powered LLC directs all employees, external stakeholders, suppliers, and former employees to the AB Volvo EthicsPoint reporting system (Volvo Whistle) for reporting of potential Code of Conduct violations, including the option of anonymous reporting where permitted by applicable law. Proterra Powered LLC's Code of Conduct expressly prohibits retaliation against any individual who makes a good-faith report.

The Volvo Group Human Rights Program operationalizes our commitment to respect human rights as set out in our Human Rights Policy. The Human Rights Program describes our strategy, governance, roles and responsibilities and supports the Volvo Group in systematically identifying, mitigating and addressing human rights risks, and facilitates continuous improvement in our processes. In 2025, Volvo Group concluded a human rights risk and maturity assessment commenced in late 2023. The analysis enabled Volvo Group to identify existing good practice in its management systems as well as opportunities for improvements. With the result as a baseline, Volvo Group is working continuously to address priority gaps and strengthen human rights due diligence processes. As a result of the project, the Volvo Group has updated its salient human rights risks and established a number of priorities for further improvement, including strengthening our human rights governance. With this, Volvo Group has also developed internal tracking and reporting of potential incidents.

Proterra Powered LLC was acquired by the Volvo Group in February 2024, after commencement of the human rights risk and maturity assessment described above and was not included in the initial assessment scope. Proterra Powered LLC has independently adopted substantively equivalent human rights commitments through its own Code of Conduct, which expressly prohibits all forms of modern slavery, forced labor, human trafficking, and child labor, requires annual employee training, and directs employees and external stakeholders to the Volvo Group whistleblower mechanism. Proterra Powered LLC's supplier compliance program imposes equivalent human rights due diligence obligations on its supply chain through contractual requirements, supplier assessments, and audit rights.

#### The Volvo Group Supply Partner Code of Conduct

Since 1996, the Volvo Group Responsible Purchasing Program has consistently increased supplier requirements on environmental performance, business ethics and human rights. Since 2019, VG Trucks US suppliers (other than with respect to Proterra Powered LLC, which is addressed separately below) are required to commit contractually to comply with the [Supply Partner Code of Conduct](#). The Supply Partner Code of Conduct states that the Volvo Group does not tolerate any forms of modern slavery or forced labour, including but not limited to forced, bonded or compulsory labour and human trafficking. Consequently, Supply Partners, including their recruitment agencies, shall not engage in or tolerate restrictions of movement, recruitment fees, confiscation of identity documents and/or passports, withholding of wages, abusive working conditions, debt bondage, violence or any other kind of exploitation or abuse. Supply Partners shall have adequate policies, risk awareness, risk assessment and due-diligence processes in place to prevent modern slavery and forced labour throughout their supply network, including remediation plans addressing situations if modern slavery or forced labour is detected. Supply Partners are also encouraged to engage constructively with relevant stakeholders such as non-governmental organisations and industry associations to build awareness and proactively work towards preventing modern slavery and forced labour.

The Supply Partner Code of Conduct also states that, to achieve full effectiveness of the Supply Partner Code of Conduct, Supply Partners must ensure that all requirements are lived by in their own operations, and that their full value chain complies to the same standards. The Volvo Group also expect all our Supply Partners to integrate, share and promote the expectations of the Volvo Group Supply Partner Code of Conduct internally and throughout their entire supply network.

It is further stated that the Volvo Group requires every Supply Partner to perform due diligence in the areas covered by the Supply Partner Code of Conduct and/or applicable laws and regulations, including for the purpose of investigating and evaluating the integrity, quality, suitability, and credibility of all its potential business partners. Supply Partner's due diligence efforts shall be in line with international standards such as the OECD Due Diligence Guidance for Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights. Supply Partners shall include impacts of its own operations and its supply network with a focus on where it has the highest risks of doing harm, and appropriate to company size and circumstances. The Supply Partner Code of Conduct and the associated sustainability performance is a key indicator in the Volvo Group Supply Partner qualification and assessment process. We reserve the right to audit the Supply Partner and its network at any point during the contract period. Lack of cooperation and failure to address violations may result in reduction of business and, ultimately, an end to the business relationship with the Volvo Group. The Supply Partner Code of Conduct is publicly available at [Volvogroup.com](http://Volvogroup.com).

#### Proterra Powered LLC Supplier Code of Conduct

Proterra Powered LLC does not use the Volvo Group General Purchasing Conditions as its standard supplier contracting mechanism. Instead, Proterra achieves equivalent supplier compliance obligations through its own supplier agreement templates and the Proterra Supplier Code of Conduct (SQ-POL-002),

which is incorporated by reference into all Proterra Powered LLC purchase orders and supplier agreements. Proterra Powered LLC's Supplier Code of Conduct contains the same substantive prohibitions as the Volvo Group Supply Partner Code of Conduct, including explicit prohibitions on all forms of modern slavery, forced labor, human trafficking, and child labor, as well as requirements for supplier due diligence, periodic internal review, and immediate notification of non-compliance. Proterra Powered LLC also maintains a Supplier Partner Manual (SQ-POL-003) and a Regulatory and Environmental Compliance Declaration (SRC-POL-001) that impose additional compliance obligations on all Proterra suppliers, including explicit forced labor certification requirements with supply chain traceability documentation. Proterra Powered LLC reserves the right to conduct on-site audits of any supplier at any time and uses this right in its ongoing supplier management program.

### Sustainable Materials Sourcing and Due Diligence Policy

In 2025 we introduced a Sustainable Materials Sourcing and Due Diligence Policy. This policy is based on internationally recognized human rights and labor standards and is intended to facilitate compliance with applicable legal regulations in our sourcing practices. It reinforces our expectations for traceability, responsible sourcing, and robust risk assessment across the supply chain, complementing the Supply Partner Code of Conduct. The Sustainable Materials Sourcing and Due Diligence Policy is publicly available at [Volvogroup.com](https://www.volvogroup.com).

In addition, Proterra Powered LLC implements equivalent responsible sourcing and supply chain due diligence obligations through its Supplier Code of Conduct (SQ-POL-002) and Regulatory and Environmental Compliance Declaration (SRC-POL-001), which requires suppliers to maintain compliance with applicable environmental and materials regulations, provide traceability documentation, and conduct and document supply chain due diligence. SQ-POL-002 is incorporated by reference into all Proterra Powered LLC purchase orders and supplier agreements, and SRC-POL-001 is required to be flowed down by all Proterra Powered LLC suppliers to their sub-tier suppliers.

### Sustainable Materials Program

Bulk material such as steel, aluminium and polymers generally have regional supply chains. Sustainability impacts related to these materials can arise in extraction and refinements of materials in a range of tiers. We have identified certain materials in parts and components which are considered high risk from a social and environmental perspective, including, for example, tin, tantalum, tungsten, gold, cobalt, and mica. For high-risk materials, we work to prevent adverse impacts through the Volvo Group [Sustainable Materials Program](#). The program follows the OECD Due Diligence Guidance for Responsible Supply Chains and uses tools from the Responsible Minerals Initiative. Focus materials for 2025 under the program were tin, tantalum, tungsten, gold, cobalt and mica. These materials are used in many components, but we have limited influence over the source. The program identifies tier 1 supply partners whose parts contain these materials. Supply partners declare their due diligence measures and disclose smelters or refiners in their supply chains. This collaboration enables us to identify, map and mitigate potential risks.

Proterra Powered LLC maintains its own Conflict Minerals Policy (SQ-POL-001), which requires all manufacturing suppliers to complete the Responsible Minerals Initiative Conflict Minerals Reporting Template (CMRT) and conduct supply chain due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Proterra Powered LLC's current conflict minerals program covers tin, tantalum, tungsten, and gold (3TG) in accordance with Dodd-Frank Section 1502 requirements. Consistent with the Volvo Group Sustainable Materials Program's inclusion of cobalt and mica as 2025 focus materials, Proterra Powered LLC is in the process of evaluating the expansion of its conflict minerals program to cover cobalt and mica.

## United States Uyghur Forced Labor Prevention Act (ULFPA) Prohibited Entity List

VG Trucks US will not contract with any entity identified by the above Act in order to respect its obligations emanating from the various Volvo Group Policies pertaining to human rights. Likewise, VG Trucks US complies with sanctions imposed by the US Department of the Treasury's Office of Foreign Assets Control Specially Designated Nationals and Blocked Persons list.

Proterra Powered LLC additionally requires all suppliers to certify, via its Regulatory and Environmental Compliance Declaration (SRC-POL-001), that no materials, components, or products supplied to Proterra Powered LLC are mined, produced, or manufactured wholly or in part in the Xinjiang Uyghur Autonomous Region of the People's Republic of China or by entities on the UFLPA Entity List, and to maintain supply chain traceability documentation demonstrating compliance.

More information is available on our commitment and measures related to sustainability and human rights in the Volvo Group 2025 available at [Volvogroup.com](http://Volvogroup.com).

### **b. Assessing Risk and Implementing Due Diligence in Relation to Forced Labour and Child Labour**

The Volvo Group, and VG Trucks US specifically, acknowledge that there may be risks of forced or child labour in our supply chains. Specifically, and as described in more detail above in connection with our Sustainable Materials Program, the Volvo Group considers that certain metals and raw materials present supply chain risks in relation to forced or child labour. The following measures have been implemented by VG Trucks US to identify such risks and to implement the above policies:

#### Mapping of Activities

VG Trucks US has completed the mapping of all its manufacturing activities.

Mapping of Supply Chains VG Trucks US continuously maps suppliers included in its supply chain using the procedures described below:

#### Supplier Self-Assessments

VG Trucks US (other than with respect to Proterra Powered LLC, which is addressed separately below) utilizes a standardized questionnaire for the automotive industry focused on sustainability in the supply network. The self-assessment questionnaire (SAQ), considers sustainability performance within human rights, working conditions, as well as environmental and responsible supply chain management. Potential supply partners are invited to conduct the SAQ and the result is used, together with other risk parameters, in the supply partner selection process. For a selected supply partner, the self-assessment result will result in a corrective action plan if the supply partner falls below a 60% risk threshold or if a selection of questions is not fulfilled. In order to drive continuous improvement, the rating is valid for three years and thereafter a new assessment is required.

Proterra Powered LLC operates an independent purchasing function and conducts its own supplier assessment process. Proterra uses a structured Potential Supplier Assessment (SQ-FORM-005), which is administered at the commencement of each new supplier relationship and upon periodic reassessment of existing suppliers. The assessment evaluates quality management systems, EHS compliance,

regulatory compliance including social responsibility requirements, sub-supplier management practices, and corrective action processes. Suppliers must achieve a minimum score of 80% to qualify for business with Proterra Powered LLC. Assessment results are used in supplier selection decisions and in ongoing supplier performance monitoring through Proterra Powered LLC's Supplier Performance Index.

### Sustainability Audits

With respect to VG Trucks US (other than with respect to Proterra Powered LLC, which is addressed separately below), as part of the supplier selection process, additional risk analysis is conducted of potential supply partners of direct materials in high-risk countries through on-site Corporate Social Responsibility (CSR) audits. Potential indirect material supply partners are also audited when located in high-risk countries and with a contract value that exceeds a pre-defined threshold. The responsibility for improvements and corrective actions always lies with the potential supply partners. Non-compliance cases are managed by the responsible buyer, together with the auditor, until resolved. Auditing of existing supply partners follows the same procedures. Overall, the sustainability assessment of supply partners focuses on developing a sustainable supply base and establishing a strong partnership. The results are used in the sourcing decisions, and violations of the requirements are expected to be resolved in a timely manner if the long-term partnership is to remain. Those who fail to address critical issues risk not being awarded a contract or having their contracts terminated.

Proterra Powered LLC conducts its own supplier audit program independent of the shared purchasing function described above. Proterra Powered LLC may conduct process and product audits at any supplier's manufacturing site at any time. Critical suppliers are subject to on-site audits up to twice annually. Proterra Powered LLC may use third-party independent auditors and reserves the right to access supplier facilities, records, and sub-tier supplier processes. Audit findings generate corrective action requirements, and failure to address critical findings may result in disqualification or contract termination.

The above ongoing internal reviews and risk assessments have yet to detect or identify adverse findings relating to modern slavery. Should an above risk be detected, VG Trucks US will use its own commercial influence as well as that of the Volvo Group's to impose its policies to combat forced/child labour or if same proves impossible, will terminate its contract with the offending supplier.

### Contractual Mechanisms

VG Trucks US regularly makes use of the Volvo Group's General Purchasing Conditions (GPCs) (or, in the case of Proterra Powered LLC, Proterra Powered LLC's own equivalent purchasing conditions and supplier agreements), which provide a direct contractual link between third party suppliers to the aforementioned respective Codes of Conduct. The GPCs (or Proterra's equivalent supplier contracting documents) are included in our suppliers' contracts and within each suppliers' purchase order.

### Grievance Mechanisms

The Volvo Group offers various channels to internal and external stakeholders to report on potential ethical concerns or violations of the Volvo Group policies, including our whistleblower process, the "Volvo Whistle", which is publicly available on [Volvogroup.com](http://Volvogroup.com). 'Volvo Whistle' is available to all employees, consultants, managers and staff of VG Trucks US. Reports can be made anonymously wherever permitted by local law. It is also possible to reach out to the Whistleblowing and Global Investigations Team via email or mail. All available channels are easily found on [Volvogroup.com](http://Volvogroup.com), along with our policy on protection from retaliation. The Volvo Group encourages our employees, representatives and external stakeholders to report and act on suspected breaches of our Code of Conduct and other policies, including human rights matters, and invite external third parties such as business partners, customers,

suppliers, dealers, consultants, former or potential employees, or anyone else who is concerned with Volvo Group's business to report their concerns. In our publicly available Whistleblowing and Investigations Policy, we inform about how to report and our commitments regarding anonymous reporting, confidentiality, independent and objective investigations, the feedback to the reporting party and a clearly stated non-retaliation policy for goodfaith reporting.

### **c. Measuring the Effectiveness of our Actions**

As explained in the Volvo Group Annual Report 2025 available at [Volvogroup.com](http://Volvogroup.com) (see page 181), there is a dedicated Group Compliance function that oversees the implementation of a compliance management system approach for core compliance areas. The Volvo Group's compliance management system includes, among other things, policies, guidelines and procedures, regular compliance communication and training, as well as assurance activities such as effectiveness testing and auditing.

The Volvo Group's internal audit function, Group Internal Audit, provides the Board and the Group Executive Board with an independent, risk based and objective assurance on the effectiveness and the efficiency of the governance, risk management and control systems of the Volvo Group. The audits cover, among other things, assessments on the adequacy and effectiveness of the Volvo Group's processes for controlling its activities and managing its risks and evaluation of compliance with policies and directives, including those reviewed in this report.

### **d. Training and capacity building:**

VG Trucks US regularly trains its employees and also offers supplier-facing training on the Supply Partner Code of Conduct. All employees with access to computers are required to complete a yearly Volvo Group Code of Conduct e-learning module. For employees in the production environment or without access to computers, managers are required to lead mandatory Volvo Group Code of Conduct training sessions. Beyond the mandatory compliance training program, the Volvo Group also offers a series of other training modules on a demand basis. On top of this, Volvo Group's top management, Group Compliance and other internal stakeholders regularly communicate the importance of conducting business in an ethical manner.

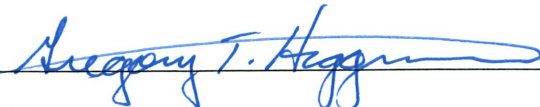
It is of note that all VG Trucks US employees must reiterate their commitment to this Code of Conduct at the end of each annual training.

### **e. Remediation Measures**

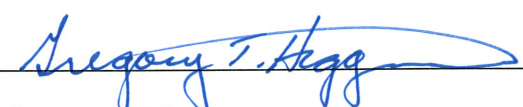
VG Trucks US has not identified any incidents of forced or child labour in the supply chains of any of its operating divisions. We have, therefore, not had occasion to adopt any remediation measures to address forced or child labour, nor any related measures to remediate income losses. In the event an incident does arise, VG Trucks US is committed to implementing appropriate remediation measures and related loss-mitigation measures.

### Approval and Attestation:

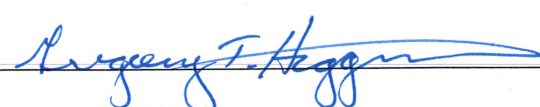
In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. I attest that the report has been approved by the board of directors of Volvo Group North America, LLC and that, based on my knowledge, and having exercised reasonable diligence, the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signature:	
Name:	Gregory T. Higgins
Title:	SVP, General Counsel & Secretary
Date:	05/26/2026
<i>I have the authority to bind Volvo Group North America, LLC</i>	


In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. I attest that the report has been approved by the board of directors of Arrow Truck Sales Incorporated and that, based on my knowledge, and having exercised reasonable diligence, the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signature:	
Name:	Gregory T. Higgins
Title:	Director
Date:	05/26/2026
<i>I have the authority to bind Arrow Truck Sales Incorporated</i>	

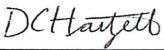
In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. I attest that the report has been approved by the board of directors of Mack Trucks, Inc. and that, based on my knowledge, and having exercised reasonable diligence, the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signature:	
Name:	Gregory T. Higgins
Title:	SVP, General Counsel & Secretary
Date:	05/26/2026
<i>I have the authority to bind Mack Trucks, Inc.</i>	


In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. I attest that the report has been approved by the board of directors of SVO, LLC and that, based on my knowledge, and having exercised reasonable diligence, the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signature:	
Name:	Gregory T. Higgins
Title:	SVP, General Counsel & Secretary
Date:	05/26/2026
<i>I have the authority to bind SVO, LLC</i>	

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. I attest that the report has been approved by the board of directors of Mack Defense, LLC and that, based on my knowledge, and having exercised reasonable diligence, the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signature:	
Name:	David Hartzell, Sr.
Title:	President
Date:	05/21/2026
<i>I have the authority to bind Mack Defense LLC</i>	

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. I attest that the report has been approved by the board of directors of Proterra Powered LLC and that, based on my knowledge, and having exercised reasonable diligence, the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signature:	 <a href="#">Chris Bailey (May 20, 2026 17:55:34 EDT)</a>
Name:	Chris Bailey
Title:	CEO
Date:	05/20/2026
<i>I have the authority to bind Proterra Powered LLC</i>	








# VG TRUCKS US WITH PROTERRA REPORT CLEAN CANADIAN ACT AGAINST FORCED AND CHILD LABOUR 2026 --final clean

Final Audit Report

2026-05-20

Created:	2026-05-20
By:	Jen Miller (jmiller5@proterra.com)
Status:	Signed
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