

TP Management GmbH | Magirus-Deutz-Straße 16 | 89077 Ulm | Germany

To whom it may concern

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August 27, 2021

## Slavery and Human Trafficking Statement for the financial year ending 31 Dec 2020

### A. Introduction

This statement is made pursuant Section 54 of the UK Modern Slavery Act (2015) that requires commercial organizations operating in the UK with an annual global turnover in excess of £36m to produce a 'slavery and human trafficking statement for each financial year of the organization'.

It is released by the entities of the TRANSPOREON Group in response to the Act for the fiscal year 2020 and covers the following companies:

- TP Management GmbH, Ulm / Germany
- Transporeon GmbH, Ulm / Germany
- Mercareon GmbH, Ulm / Germany (till 30 September 2020; has been merged with Transporeon GmbH as of 01 October 2020)
- Ticontract GmbH, Kempten / Germany
- TIM Consult GmbH, Mannheim / Germany
- Transporeon Sp. z.o.o., Kraków / Poland
- Transporeon O.O.O., Moscow / Russian Federation
- Transporeon Group Americas, Inc., Pennsylvania / U.S.A.
- Transporeon Group Asia Pacific, Pte. Ltd., Singapore
- Transporeon B.V., Breda / the Netherlands

The statement sets out all the steps Transporeon Group has taken to reduce and to eliminate the risk of slavery and human trafficking in our business or global supply chains. It describes our business structure, relevant policies, and ongoing efforts to tackle this problem.



**Registered office**  
89077 Ulm

**Commercial register**  
Amtsgericht Ulm

HRB 738281  
VAT No. DE 323 536 944

**Managing Directors**  
Peter Maluck  
Stephan Sieber

**B. Our business**

The Transporeon Group provides logistic services via three cloud-based logistic platforms (i.e., Transporeon for 10 different industries, Mercareon especially for the retail industry, Ticontract for logistical tender processes) to its customers. These platforms link connect over 1,300 shippers (i.e., producers or manufacturer of goods, suppliers, and retailers) and over 130,000 carriers (i.e., logistics and transportation service providers, 3PLs, freight forwarders, brokers, and drivers) through a range of software-as-a-service solutions, that are used in more than 100 countries.

Best in class, TRANSPOREON Group solutions include onboarding, consultancy, and lifetime support to ensure a customized fit for each organization, boosting shipper/carrier performance and cutting costs while optimizing carrier margins and lowering CO2 emissions.

The Transporeon Group has its head office in Ulm, Germany, with an annual turnover in excess of £100 million. It is operating across 100 countries and is divided geographically into Business Areas covering Continental Europe & UK, North America, Asia and the Rest of the World.

**C. Our supply chain**

Our supply chain network is largely based on service driven to benefit the daily operation. The services provided include primarily

- employees and 3rd party developers,
- open source software and 3rd party software,
- office furniture & office requisites (incl. IT equipment),
- customary services from 3rd parties (e.g. facility management incl. lease agreements, recruiting by external agencies, cleaning, catering, security).

The majority of our suppliers is based in Germany, Poland and in the U.S., i.e., close to where the premises of the respective entities are located.

We establish and foster relationships with our supplier to align them with our commitment to our care our values and principles, as defined in the Transporeon Code of Conduct.

**E. Our policies on slavery and human trafficking**

We have a zero-tolerance approach to slavery and human trafficking, and all entities of the Transporeon Group strictly prohibit all forms of forced or compulsory labor.

These principles are also set out in the current Transporeon Code of Conduct:

*“Our aim is to be economically successful, hereby maintaining a high degree of integrity and fulfilling our social responsibility. Employees, managers, our business partners and customers may be confident that our work is always characterized by professionalism, reliability and fairness. In order to achieve these goals, we have groupwide binding ethical rules that guide us in our dealings. These serve as an orientation and guideline for decisions and actions of the company as well as for each individual.”*



Furthermore, a compliant behavior with applicable laws and ethical standards is a matter of course for the management and all employees of the Transporeon Group and integral part of every business activity. Human rights must always be respected. It is self-evident, that no child or forced labor will be accepted. Working hours must always comply with applicable laws, salaries in accordance with the legal requirements in the respective country of the work location.

When it comes to occupational health and safety, we do not only offer an own a health supportive work environment but are promoting proactively the health of our employees. In this respect, it is important to underline that we do expect our suppliers to maintain and promote fundamental human rights, to abstain from any form of slavery and human trafficking and to take due account of the health of their employees.

Our commitment to these non-negotiable values is outlined in

- the Transporeon Code of Conduct, that forms the fundamental base for all our business and daily activities. It is published internally and externally to the attention of employees as well as to all suppliers and customers (see [www.transporeon.com](http://www.transporeon.com) )
- the Compliance Manual, that is part of the contract of employment for each employee, being used as group-wide internal quick reference handbook, the base for our ongoing online training program.

#### **F. Our people**

In its entirety, all entities of the Transporeon Group employed 781 people in 20 countries worldwide (pre-dominantly in Continental Europe & UK, Russia, USA, Singapore) as of 31 December 2020.

Wherever our colleagues are employed, we do expect that each of them is working in line with our core values and principles according to the Transporeon Code of Conduct and all accompanying documents.

In case of irregularities, misconduct, any act of modern slavery or trafficking each employee is being entitled and being asked to report the incident to the respective superior, managing director and/or to the Chief Compliance Officer. At the employee's choice, full confidentiality will be assured and maintained as well as legal and professional support will be provided, if needed.



**G. Due diligence processes for slavery and human trafficking**

The Transporeon Group is a strong partisan of the “know your customer” (KYC) approach with the aim to build up a long-term partnership with business partners as the founding element of its sustainable business success.

For this reason, all suppliers are subject to legal terms and conditions with the Transporeon Group. Our Code of conduct serves in this regard as a guide to all of our business and to all third-party suppliers of products or services.

Moreover, assessments of current or potential supplier are being completed as part of our regular contracting process, including:

- reviewing the performance, e.g., accomplishment of their legal and contractual obligation, as well as continuous monitoring of suppliers for any changes in contracts, general clauses, processes, policies, service and acting persons.
- check of suppliers based on the relative risk (e.g., the respective peer group of country, industry, turn over, adverse media etc.).

Newly acquired companies undergo a comprehensive due diligence process that assesses their regulatory compliance, environmental and safety standards as well as their reputation.

**H. Adherence of our supplier to anti-slavery and anti-trafficking**

The Transporeon Group runs a zero tolerance to slavery and human trafficking. We are fully committed to make sure that all suppliers and business partner comply with our values, our terms and conditions for the supply of goods and services.

Therefore, we may take some corrective actions in case of a breach of the UK Modern Slavery Act (2015), e.g. as

- to classify a wrongful behavior of slavery and human trafficking as a serious incident under the contract of service,
- to terminate the contract of service and to hold the supplier liable.

**I. Education and training**

Due to its importance, all entities of the Transporeon Group are routinely and continuously conducting mandatory training sessions and are reminding their staff on their obligations according to the laws, under our Code of Conduct and all accompanying Compliance policies.



**J. Signatures**

The board of directors of the Transporeon Group entities described above, and in-scope of the Act, reviewed, approved, and signed this statement through an authorized director.

Ulm / Germany on 27 Aug 2021

DocuSigned by:  
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Stephan Sieber  
CEO

DocuSigned by:  
*Peter Maluck*  
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Peter Maluck  
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