

THE DESCARTES SYSTEMS GROUP INC.

Slavery and Human Trafficking Statement

This statement sets out the steps which The Descartes Systems Group Inc. ("Descartes") and its affiliates have taken to combat slavery and human trafficking. It continues to be a priority for Descartes and its affiliates to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was done in consultation with Descartes affiliates to ensure a deep understanding of risks related to modern slavery and human trafficking in our operations worldwide.

This statement highlights the key activities we have undertaken to combat modern slavery in our organisation and supply chain.

Organisation's structure

We are a global leader in providing cloud-based logistics and supply chain solutions. The Descartes Systems Group Inc., parent to over 50 subsidiaries worldwide, has its head office in Canada. We have over 2,400 employees and operate in the Americas, Europe, and Asia Pacific.

We have a global annual turnover of more than USD 650 million.

Our supply chains

We recognise that it is crucial for us as an organisation to have oversight of our supply chains so that we can understand the risks of modern slavery along the chain and take action to mitigate against those risks.

As a part of our portfolio of logistics and supply chain solutions, we design, and contract for, the manufacture of electronics devices for Electronic Logging Devices ("ELDs"). Our ELDs contain an array of electronic components similar to what is found in other modern, communicating devices. Computer processing chips, cellular modems, Wi-Fi chipsets, GPS chipsets, and other components sourced from manufacturers around the globe are used in the fabrication of our devices. We work with many of the leading components suppliers in the market to build high quality devices for our customers.

As part of our manufacturing processes, we use immediate suppliers and US-based manufactured products.

Our immediate suppliers source raw materials from further down the supply chain. For example, a local supplier may purchase components from an Asia-based wholesaler, who

may source parts from yet further originating countries. Our suppliers all source hardware from reputable and certified component suppliers.

Our policies on slavery and human trafficking

The Compliance Officer has primary and day to day responsibility for implementing this statement, monitoring its use and effectiveness, dealing with any queries about it and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

We aim to have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We continuously review and update all our policies and Descartes expects all suppliers engaged by the organisation to respect and conform to our fundamental values as conditions for mutual business.

Our Code of Business Conduct and Ethics reflects our commitment to acting ethically and with integrity in all our business relationships.

Our Global Anti-Corruption Policy aims at fostering a culture of honesty, fairness, and dignity in all of Descartes' dealings, and its employees, supplier, and business partners' dealings with Descartes. Descartes communicates its Global Anti-Corruption Policy to its various partners and expects them to abide by the principles set out in this policy.

Our Policy on Conflict Minerals seeks to implement and enforce effective systems and controls to ensure conflict minerals and modern slavery practices have no place in our products and supply chains.

We carry out appropriate checks to ensure that all our staff have the requisite right to work documentation, that they are paid fairly and that they receive a competitive remuneration package for the work they undertake.

We also have a Whistleblower Policy, whose goal is to foster the reporting of any potential concerns related to ethics, employment and labour laws, and to afford protection to those who raise such issues. Through this policy, the Audit Committee of the Board of Directors has a direct role in overseeing Descartes' compliance with any issue related to employment and ethics globally.

We continuously review and update our policies. The latest version of our policies is available on our Legal & Compliance page: <https://www.descartes.com/resources/legal-compliance>.

Due diligence processes for slavery and human trafficking

We understand that the sourcing of materials gives rise to some of the highest modern slavery risks.

We believe in responsibly sourcing components for our devices and understanding the negative impacts that conflict-derived minerals have on the peoples of affected regions and modern slavery risk. As part of our commitment to corporate responsibility and respecting human rights in our own operations and in our supply chain, it is Descartes' goal to use minerals that do not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries ("DRC"), while continuing to support responsible mineral sourcing.

As part of our initiative to identify and mitigate risk, our hardware designs take account of component source to ensure high levels of compliance and reduce risks associated with modern slavery.

We have undertaken a survey of our supplier base in order to identify any suppliers of components with conflict mineral content, with the goal of working with our suppliers to remove conflict minerals, if and where they exist, from our supply chain. Over the course of that survey, we obtained suppliers' assurances and statements related to compliance and conflict minerals. To date, none of our suppliers have indicated that their components contain conflict minerals, or metals derived from smelters in the DRC or adjoining countries. Descartes has no reason to believe that we have any conflict minerals in our devices, and we will continue to encourage our supply chain partners to provide components which are conflict mineral-free, in an effort to reduce overall risk of modern slavery in our operations.

We also have in place systems to ensure:

- Supplier adherence to our values and ethics;
- Reporting obligations and mechanisms; and
- Protection of whistleblowers.

Our internal teams across the world all contribute to our overall effort to fight modern slavery, and consist of involvement from the following departments:

- Legal;
- Human resources;
- Procurement; and
- Product management.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff worldwide, which includes training on human rights.

Staff are expected to be alert to the risks, however small, in our business and in the wider supply chain. Staff must report concerns and management are expected to act upon them.

We conduct reviews of the effectiveness of the measures enunciated in this statement to ensure that there is no slavery or human trafficking in our supply chain. These reviews include follow-ups with our suppliers to ensure that all assurances obtained remain accurate as at September 3, 2025. Descartes remains committed to combatting modern slavery and human trafficking and to fostering a culture of fairness and dignity in all its business relationships.

Last Updated

This policy was last updated on September 3, 2025.