



VERRA
MOBILITY

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LEGAL & COMPLIANCE POLICIES

**Human Rights and Anti-Modern Slavery
Policy**

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Human Rights and Anti-Modern Slavery Policy

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1. Purpose

- a) Verra Mobility Corporation (Verra Mobility) and its global subsidiaries (Verra Mobility Group) recognize our community responsibility in the protection of human rights through our own ethical business practices. We also recognize that compliance with applicable human rights laws and standards is an important issue to our employees, customers, vendors, shareholders, stakeholders and the global community. Therefore, Verra Mobility seeks to ensure that human rights are valued and honored across our global business, operations and supply chain.
- b) Further, Verra Mobility is committed to identifying and eliminating human rights and modern slavery risks and practices within our business operations and supply chain.
- c) The purpose of this Human Rights and Anti-Modern Slavery Policy ("**Policy**") is to set out Verra Mobility's standards in respect of identifying and eliminating human rights and modern slavery risks and practices within our business operations and supply chain.

2. Definition of Human Rights and Modern Slavery

- a) "**Human Rights**" are rights that all human beings are entitled to regardless of their race, ethnicity, sex, gender, language, religion or other applicable status. These include but are not limited to: the right to life and liberty, freedom from slavery and torture, and freedom of speech.
- b) "**Modern Slavery**", "**Slavery**", "**Human Trafficking**", "**Child Labor**" and "**Forced or Compulsory Labor**" – Verra Mobility Group adopts the definitions in the *Modern Slavery Act 2018* (Aus) in Australia only, the *Modern Slavery Act 2015* (UK) in the UK only, the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Canada) in Canada only and other applicable modern slavery or forced labor laws in their respective jurisdictions¹. Without limitation to these definitions, for the purposes of this Policy, Modern Slavery refers to the exploitation of individuals and includes but is not limited to: human trafficking, slavery, forced labor, child labor, coercion, deception and physical confinement.

3. Our Commitment

- a) Verra Mobility is committed to making positive contributions to our customers, consistent with the principles of honesty, integrity, fairness and respect.

4. Our Approach

- a) Verra Mobility policies and governance framework support its day-to-day operations with one of our goals being to ensure applicable human rights laws and standards are observed.
- b) Verra Mobility Group requires its employees, directors, officers, agents, consultants, vendors, suppliers, subcontractors, business partners and other key stakeholders to

¹ This is a non-exhaustive list of applicable modern slavery or forced labour laws and may include applicable new laws introduced in jurisdictions that we already operate in and applicable existing laws in jurisdictions that we newly enter in the future.

observe ethical business standards consistent with Verra Mobility Group policies, such as our Anti-Bribery and Anti-Corruption Policy and our Code of Business Ethics and Conduct (see Verra Mobility Group's Governance Documents disclosed on our website (<https://www.verramobility.com/integrity-compliance/>)), and remains committed to working with its supply chains, business partners and other key stakeholders to fulfil this aspiration.

5. Prevention, Identification and Elimination of Human Rights and Modern Slavery Risks and Practices

- a) Employees, directors, officers, agents, consultants, vendors, suppliers, subcontractors, business partners and other key stakeholders are expected to operate in line with applicable Human Rights and Modern Slavery laws and the policies listed in Section 7 below. External stakeholders are also required to, at all times, comply with their legal obligations in relation to applicable Human Rights and Modern Slavery laws.
- b) Verra Mobility Group encourages internal and external stakeholders to notify us of any identified or suspected Human Rights and Modern Slavery risks within our business operations or supply chain.
- c) Any suspected or actual Modern Slavery risks or practices are to be reported to a member of the Compliance Department. You may also contact the Ethics Line 844-927-2814 (visit the website for telephone numbers outside the U.S.), ethicsline.verramobility.com, where you may remain anonymous.
- d) Where necessary, Verra Mobility will take all reasonable steps to ensure confidentiality of all reports made under this Policy, and to ensure the reporting stakeholder will be treated fairly.

6. Review of Policy

- a) Verra Mobility will review this Policy periodically to ensure it complies with applicable legal requirements and remains relevant and effective.
- b) Verra Mobility may change this Policy at any time.
- c) This Policy is not intended to be contractual in nature.

7. Related Documents

- *Anti-Bribery and Corruption Policy and Procedure*
- *Anti-Facilitation of Tax Evasion Policy (UK)*
- *ANZ Anti-Discrimination Harassment and Bullying Policy (AU & NZ)*
- *Charitable Donations and Corporate Sponsorship Policy*
- *Code of Business Ethics and Conduct*
- *Code of Business Ethics and Conduct for Consultants*
- *Code of Business Ethics and Conduct for Product and Service Providers*
- *Equal Employment Opportunity Policy (UK, AU & NZ)*
- *Records & Information Management Program Policy*
- *Reporting Violations and Complaints Policy*
- *Reporting Violations and Complaints Policy Australian Whistleblower Supplement (AU)*

8. Ownership

| Owner | Title | Signature |
|--------------|--|-----------|
| Raph Avraham | Deputy General Counsel, Head of Corporate Compliance | On File |

9. Revision History

| Version | Description | Revision Date | Approver Name |
|---------|------------------|---------------|---------------|
| 1.0 | Original version | June 26, 2025 | Raph Avraham |