

# HERE Modern Slavery Statement

This statement outlines the steps taken by HERE International B.V. and all the direct and indirect subsidiaries of HERE International B.V. in which HERE International B.V. owns a majority of the shares or exercises effective control (“HERE Technologies”) pursuant to section 54(1) of the Modern Slavery Act 2015 during the financial year 2022 - to assess our susceptibility to modern slavery risks, review our due diligence and risk assessment practices, and to continue to ensure that modern slavery and human trafficking is not taking place in any of our supply chains, and in any part of our business.

The term "modern slavery" is used in this statement to describe a range of situations in which coercion, threats or deceptions are used to exploit individuals and undermine their freedom. These situations include, but are not limited to, slavery, servitude, forced marriage, forced labour, debt bondage, indentured labour, deceptive recruiting for labour and child labour. It also includes withholding of identification documents and human trafficking.

## Organisational structure and supply chains

HERE Technologies is a location data and technology company. From creating the first digital map over 35 years ago, we are now the world's leading location platform company. We operate across a variety of industries ranging from automotive, transport, logistics, manufacturing, retail and the public sector. We aim to better the utilisation of assets which businesses deploy on a global level, with an overall view to reducing the environmental impact of the same. We believe that we need to use space, time and resources much more effectively, and location data and technology are critical in achieving this. Together, with our customers, we work on enabling better business outcomes, while realising our vision for a more sustainable planet. We have operations in 52 countries, employing over 6,400 employees.

At HERE Technologies, our suppliers are essential to our vision: enabling an Autonomous World for everyone. Thanks to positive, lasting relationships with our suppliers, we continue to push the envelope and deliver cutting-edge solutions for today's fast-paced economy. Of our company's core values, 'Win Together' best demonstrates our belief in successful, mutual partnerships. Only through teamwork can HERE continue to provide innovative solutions to customers and build strong relations with suppliers.

HERE has policies and procedures in place aimed at promoting sustainability and compliance throughout our entire supply chain.

## Our policies

### Human Rights and Modern Slavery

HERE is committed to integrating respect for human rights into our global operations and across our value chain. In practice, this means HERE:

- Trains HERE people on international human rights standards and what they mean in practice.
- Conducts self-assessments based on environmental, social and governance (ESG) factors to identify gaps and remedy known impacts.
- Conducts ESG supply chain audits and engages suppliers in remediation plans based on severity of known impacts; participates in our customers' supplier audits.
- Participates in industry initiatives that advance and promote the business responsibility to respect human rights, mitigate common risks, and remedy known impacts.
- In alignment with global trade laws, conducts due diligence on suppliers and other business partners to mitigate risk of HERE solutions being used to infringe upon rights.
- Complies with UN, European, United States and other applicable sanctions.
- Operates to the standard of international human rights law and applies these standards when local law falls short of international human rights standards or there are no relevant national laws. Where local laws conflict, HERE aims to honour the principles of internationally recognized human rights.
- Prohibits the hiring of child labour. The minimum age for full-time employment must be 15 or the legal minimum age for employment under applicable law, whichever is higher. Further prohibits the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.
- Prohibits any form of forced labour including bonded labour, prison labour, indentured labour and slave labour, or human trafficking.
- Provides annual reporting in alignment with the United Nations Guiding Principles Reporting framework, beginning in 2020.
- Provides employees, suppliers, and business partners with access to grievance mechanisms with a clear policy of no retaliation. Promptly investigates and remedies human rights violations.

### Code of Conduct

We have a [Code of Conduct](#) in place in order to help our people make smart and ethical decisions. Our Code of Conduct keeps us in line with our desire to be an ethical business, as our customers and the communities in which we operate expect. Our Code of Conduct provides clear and simple directions for all employees to follow. It covers all of our business activities and contains expected behaviours for all employees. This includes an obligation to report any potential violations and participate / cooperate in any investigations.

The Code of Conduct applies to all employees and to employees of other businesses which we have a majority shareholding or exercises effective control. We also make

a good faith effort to implement the Code of Conduct (or something similar) in operating entities in which we invest, but do not own a majority stake.

Our Code of Conduct contains specific sections on fair labour conditions and employment. There are explicit warnings to look out for failures to observe labour laws (e.g. child labour, compulsory labour, etc.). It also contains a section on human rights.

We have a strict no-retaliation policy against anyone who raises concerns of any kind.

### Supplier Code of Conduct

Supplier management is a crucial part of our Corporate Responsibility program. HERE continues the push to implement corporate responsibility and ethical practices into every aspect of its supply chain, including the many external vendors, suppliers and service providers with which we collaborate and do business. HERE has committed to only working with vendors who share our high ethical standards when it comes to abiding the laws and policies of the countries in which we operate. And, to monitor our suppliers' performance with HERE's expectations, we established a supplier audit program in 2019.

Our [Supplier Code](#) sets down our expectation for our suppliers to at least meet the applicable laws and regulations in the countries in which we and they operate. We encourage suppliers to go beyond legal compliance by committing to meet relevant international standards (such as those from the International Labour Organization or applicable United Nations conventions) and to commit to continuous improvement.

The Supplier Code contains specific sections and guidance on ensuring safe methods to report abuses as well as labour and human rights aspects such as a prohibition on using forced, bonded, or compulsory labour. We also expressly prohibit the use of child labour and human trafficking by our suppliers and have a commitment to allowing free association.

The Supplier Code requires HERE suppliers to have adequate management systems in place, which are designed to ensure compliance with the Supplier Code of Conduct and applicable laws.

### Reporting Mechanisms

We have implemented mechanisms through which HERE employees, suppliers, and other stakeholders can report concerns regarding modern slavery and any other compliance issue (including anonymously) to the company.

HERE investigates and remediates all credible allegations and concerns related to legal, compliance, human rights and other violations in the company and in its supply chain. HERE is committed to remediating the findings of any such

investigation. Investigations are undertaken by, or with the oversight of, the HERE Ethics and Compliance Committee, which reports to senior company management.

### Violations and Discipline

For HERE employees any violation of the HERE Code of Conduct, other HERE Policies and Procedures or applicable law, will result in effective corrective action or employee discipline when necessary. Disciplinary measures, up to and including termination of employment, will be applied subject to local law.

For suppliers, any violation of the Supplier Code of Conduct or applicable labour or human rights rules results in corrective action. The appropriate action in a particular case depends on the nature and severity of the violation and the circumstances surrounding the situation. Failure to comply with the Supplier Code and applicable laws and regulations may result in the termination of the supplier's agreement with HERE and referral of the matter to local authorities.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes HERE Technologies' slavery and human trafficking statement.

Amsterdam, the Netherlands on December 1, 2022

Signed

By: E.J.C. Overbeek

Title: CEO / Managing Director

By: A. Manzoor

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