

Code of Conduct

A roadmap for
smart decisions



here

A man with a beard and glasses, wearing a light blue patterned button-down shirt, stands in a meeting room. He is gesturing with his hands as if speaking to a group of people. In the foreground, the backs of the heads of several people are visible, including a woman with dark hair and a man with glasses. The room has a stone wall and large windows in the background.

The HERE Code of Conduct

We each make thousands of decisions every day. Some are simple choices. Others have significant long-term consequences for HERE and for you. But in every decision, big or small, we're guided by HERE's ethical principles and our core values.

That's what the HERE Code of Conduct (the "Code") is for. Consider it your guide to smart and ethical decision-making, every step of the way.

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Foreword by David Kenzer and Werner Buskermolen



David Kenzer

*Senior Vice President and
Chief Legal and Compliance Officer*



Werner Buskermolen

*Senior Vice President and
Chief Human Resources Officer*

HERE: an ethical business driving a revolution in location technology

As HERE accelerates ahead, one core foundation is how we conduct ourselves in the everyday – in the ways we collaborate, communicate and innovate, both internally and externally. A single source of truth and common HERE standards for our global team to rally around are fundamental. To that effect, we have the HERE Code of Conduct.

The Code is our guide to making decisions that reflect our high ethical business standards. Our Code applies to everyone at HERE – across all roles and all levels. Each of us must act as a responsible partner in society, conducting ourselves with integrity in our interactions with colleagues, customers, business partners and the wider community in which we operate.

We take our responsibilities seriously. The technologies we create are a powerful force for good, helping to make our roads safer, logistics networks more efficient and our air cleaner. At the same time, we know that new technologies also bring far-reaching and rapid change,

as well as new risks. This is why, at HERE, we strive to be responsible stewards of our industry, making sure that our products and services enhance quality of life, that we carefully consider people’s privacy, and that we embrace inclusiveness in our diverse society.

These core beliefs apply everywhere we operate. HERE is active in nearly every country in the world and we sometimes encounter ethical challenges and environments in which standards aren’t as high as within HERE. But no matter what the circumstances, we must never let our guard down or lower those standards. In every instance, it’s important that we never compromise our core values. You know them: Be Bold, Be True, Learn Fast, Give Back and Win Together.

So, let our Code be our guide to doing the right thing. But remember: our Code cannot address every possible challenge that you may face in your work for HERE. If you have any questions or concerns, or if you become aware of a situation that you find concerning, you must reach out to us. Our doors are always open, and you may report your concerns anonymously, without fear of retaliation. Details of how to raise questions or concerns are contained in our Code.



02

Purpose and scope

We hold ourselves to the highest ethical standards and our customers, employees and the communities in which we operate expect HERE to be a lawful, reliable and ethical business. The HERE Code of Conduct keeps us strong and builds trust by explaining the expected behavior and responsibilities of all HERE personnel as well as those of our affiliates, suppliers and partners.

Applicability

We're all in this together. That means the Code applies to everyone at HERE, from the junior members of our team through to our senior executives. This includes, amongst others, directors, officers and employees. The Code also applies to all directors, officers and employees of other business ventures in which HERE owns a majority of shares or exercises effective control.

We require the principles expressed in the Code to be followed by all those with whom we do business.

To the extent the laws and regulations in your country of operation impose stricter requirements than those contained in the Code, you should comply with such laws and regulations.

HERE's Ethical Principles:

- We follow the laws of the countries where we do business, and we adhere to HERE's policies and procedures.
- We set an example for each other, our stakeholders and all of those with which we do business by being honest and fair.
- We maintain the confidentiality of information entrusted to us, except when disclosure is authorized or legally mandated.
- We disclose promptly any conflicts of interest that might influence our business judgment and avoid any appearance of impropriety in our dealings with others.
- We promote a culture of integrity through mutual respect, trust and highly ethical behavior.
- We hold each other accountable to this Code and our core values and if we become aware of potential violations, we promptly report them.



03

Our core values

The Code is based on and implements HERE's core values. Our core values enable us to conduct our business with integrity and to build and preserve trust with customers, governments, partners, representatives, developers and each other.

Our core values lead the “how” in all things we do. Five organizational values support our vision, shape our culture and reflect our company principles and beliefs:



Be Bold

Act with eagerness and fearlessness to deliver game-changing products, services and solutions that make the world better.



Be True

Engage our customers, partners, developers and one another with trust, integrity and respect.



Learn Fast

Be responsive and flexible to out-run the ever-evolving pace of emerging technologies.



Give Back

Embrace our responsibility to safeguard the environment and give back to society, starting with the places where we work and live.



Win Together

One team united, made greater by the sum of our knowledge, experience, passion and talent.



Be True and Win Together.

We're honest and fair in our business dealings, setting an example for each other and our stakeholders.



The HERE Code of Conduct in practice

4.1 Fair competition

We believe in competing fairly and comply with competition and antitrust laws. We are committed to dealing honestly, ethically, respectfully and fairly with each other and our competitors, customers and suppliers.

What do I need to know?

Our business is subject to antitrust laws and competition laws of countries in which we operate. Our policy is to compete vigorously and ethically while complying with all antitrust and competition laws. Antitrust and competition laws are designed to protect consumers and competitors against unfair business practices and to promote and preserve competition. These laws, among other things, prohibit or restrict activities related to

fixing, coordinating, or controlling prices and allocating or dividing customers, territories, or markets. As a result, you shouldn't communicate with competitors about any aspect of HERE's business. Furthermore, you should avoid any actions that violate, or even create an appearance of violating, antitrust laws.

What do I need to watch out for?

Unfair competition practices. As a HERE employee, you are responsible for bringing potential or actual violations of competition laws to the attention of HERE. Examples of unfair competition practices can include any formal or informal agreements:

With customers, suppliers, or partners:

- Making exclusive deals with partners
 - Improperly dictating the prices that independent channel partners charge their customers
- Discriminating unfairly between similarly situated customers, suppliers, or partners
- Limiting parallel trade in unified trade areas (such as the EU)

With competitors related to:

- Price fixing
 - Agreeing to raise or maintain the price at which goods or services are sold
 - Adopting a standard formula for calculating prices
 - Structuring bids to influence pricing
- Dividing customers or territories
 - Manipulating competitive bidding processes to direct a contract to a certain competitor or reseller
 - Agreeing not to market products in a certain geographic area or to certain types of customers
- Limiting the sale of products or product lines for anti-competitive purposes
- Colluding with competitors to exclude a third party or a competitor
- Disclosing confidential information to or from third parties

Learn more
Antitrust Policy



4.2 Bribery, improper payments and dealing with government officials

We believe in winning business on merit. HERE has zero tolerance for bribery, corruption and other unethical business practices. Our policies and the laws of the countries in which we operate strictly prohibit directly or indirectly giving or receiving any payments or anything else of value for the corrupt purpose of improperly influencing the recipient's actions for the commercial advantage of HERE or anyone with which we work.

Improper payments, other benefits or favors may not be made directly or indirectly to a customer, supplier, government official, their family members, or any other party.

What do I need to know?

- All countries in which HERE conducts business prohibit bribery. Typically, under anti-bribery laws, you may not provide or promise any money or anything of value to a government official to either obtain or retain business, or to secure any improper advantage. In some countries, this prohibition extends to the commercial context as well (e.g. bribes or kickbacks to or from employees of companies with which we work). These prohibitions apply whether such action is taken directly by HERE employees or through third parties, such as agents, consultants and intermediaries.
- Violation of anti-bribery laws is a crime that can result in severe fines and criminal penalties for you personally and for HERE. Always seek advice from the HERE Legal team if you are uncertain about the legitimacy of any payments or practices.
- Government officials include employees, officers, representatives and any other individuals acting on behalf of (i) national, regional, local and municipal governments, (ii) agencies, departments, or ministries

of a government, (iii) government-owned enterprises, (iv) public international organizations, and (v) political parties. Government officials also include individuals serving as candidates for political office.

- An improper payment or offer of anything of value can include, but isn't limited to, cash payments, gifts, travel, entertainment, political contributions, charitable donations, educational or living expenses, meals, employment, or consultancy opportunities, offers of employment, business opportunities, benefits or other favors. An improper payment can include such items given or offered directly to a family member or another associate.
- To address the risk of bribery in our business, HERE has implemented an anti-corruption compliance program and a system of internal controls. We also maintain books and records that accurately reflect all transactions of the company and the disposition of its assets.



What do I need to watch out for?

- Requests to deviate from our normal accounting, sourcing, sales or contracting processes.
- Engagement or payment of any party whose role in a transaction isn't clear, legal and transparent.
- The creation of any "off-books" or "slush" fund, (including any fund which isn't subject to HERE's accounting controls), or the engagement of any third party to do the same.
- Individuals or entities that operate based on personal relationships or who offer or promise access to key decision-makers at customers or government authorities.
- Any form of lavish or inappropriate gift-giving, hospitality or entertainment that may affect the objective decision-making of the recipient or be

perceived as an attempt to do so. All gifts, hospitality, or entertainment must follow HERE's Gifts & Hospitality Procedure.

- Entertainment and meals that aren't incidental to legitimate business discussions.
- Any transactions with family members or representatives of government officials that don't have a clear and demonstrable legitimate commercial purpose.

Learn more

Anti-Corruption Policy
Gifts & Hospitality Standard Operating Procedure



4.3 Conflicts of interest

Conflicts of interest occur when personal interests or activities may improperly influence our ability to act objectively and in the best interests of HERE. Conflicts of interest, or the appearance of conflicts of interest, may sometimes occur without any action on our part.

What do I need to know?

Just as important as identifying and avoiding conflicts is disclosing conflicts or potential conflicts. Employees must disclose any transaction or relationship that reasonably could be expected to give rise to a conflict of interest, or the appearance of a conflict of interest.

What do I need to watch out for?

Conflicts of interest. A conflict of interest is when you as an employee are in a situation to obtain a personal benefit derived from actions or decisions made under your current role at HERE. Additionally, a conflict of interest could be any position where personal situations may affect your professional judgment. For example:

- Business decisions in which the parties have close personal or family relationships with you, or where you or your family might stand to personally benefit.
- Personal discounts, gifts, payments, or other benefits offered or given to you by suppliers, customers or others who conduct or want to conduct business with HERE.
- Recruiting, hiring, or directly supervising family members or personal friends, or promoting someone with whom you have such a relationship.

- Being an officer or director of a charitable or civic organization that may obtain or seek to obtain funding or support from HERE.
- Investing in or serving on the board of a private company that is a competitor, partner, customer or supplier of HERE.
- Engaging in the development of outside inventions or other intellectual property.
- Taking on outside work that harms HERE's business interests or breaks any employee agreements entered into with HERE.

Learn more
Conflict of Interest Policy



Be True and Learn Fast.

We follow the laws of the countries where we do business and adhere to HERE's policies and procedures.





4.4 Accurate books and records

Honesty and transparency are principles we live by. So, when it comes to our financial records, we take the greatest care. This means implementing controls to ensure we represent financial data accurately and consistently and protect assets. To ensure their accuracy and security, all HERE financial records and related data must be maintained securely, in accordance with all HERE IT and information security policies and procedures.

What do I need to know?

→ The accuracy of our books and records is essential to our ability to meet legal and regulatory obligations.

- Our business records must conform with applicable legal, accounting and regulatory requirements.
- There cannot be any unrecorded funds, assets or any other type of “off the books” accounts created for improper purposes (this prohibition includes, but isn’t limited to, the use of inflated discounts to create additional margins/funds for off-books use, or to disguise the purpose of any company expense).
- We also expect our business partners to honestly report all business transactions and maintain accurate records. Business partners must never misrepresent pricing information, or the justification for any margin or discounting requests to HERE.
- Only employees who are explicitly authorized to do so can disseminate business and finance-related information, both internally and externally, that concerns HERE, our business activities, our strategy or any other company affairs.



What do I need to watch out for?

- Financial transactions recorded in error, such as those with the wrong date, a misleading description, false expenses or purchase orders and inaccurate time sheets or vouchers.
- Any transaction that doesn't make fundamental business sense, decisions that are inconsistent with sound business economics or financial results that don't appear consistent with the actual business performance.
- Any effort to avoid appropriate reviews for a transaction, or actions inconsistent with an employee's level of authority.
- Any absence of controls on transactions, such as dual approvals on cash disbursements or required approvals on expenses, particularly in situations involving cash.

Learn more

Corporate Card Policy

Delegation of Authority Policy



4.5 Export and trade compliance

We are proud to be a global business powering location-based services for organizations and people around the world. Operating with such an international scope means delivering technology, services and goods across borders and this activity is regulated by national and international laws that affect our operations in multiple ways. The transmission of information and data across borders by email and the web, the provision of goods and services across borders or even the exchange of information among citizens of different nations who are located in the same country, can fall under strict trade control regulations. In some instances, these regulations restrict the countries and individuals with which HERE and its staff can do business.



We comply with all applicable trade compliance laws and regulations including export controls and sanctions. We declare exports and imports, along with their value, accurately and transparently to customs authorities.

What do I need to know?

Many countries have laws prohibiting or imposing restrictions on dealings with certain sanctioned countries, entities and individuals. HERE is required to comply with U.S., EU, Dutch and other countries' trade sanctions, which restrict where and with whom we can do business, including even indirectly through partners. Sometimes these are inconsistent. It is therefore important for HERE to know where and by whom its services and solutions are being provided and accessed.

Separately, when exported or downloaded (e.g. for on-premise solutions), HERE's software and technology may be subject to export licensing requirements or restrictions.

These restrictions are routinely and strictly enforced through civil and criminal penalties. HERE's policy is to comply with all applicable trade sanctions and export controls that apply to our business. We require you and our business partners to do the same when working on our behalf and to be alert to potential red flags, such as indications that a customer or user of our services may be disguising their true location to use our data or services.

What do I need to watch out for?

Restricted entities. HERE is generally prohibited from providing services or allowing access to its solutions, directly or indirectly, to:

- Persons located or based in territories subject to comprehensive sanctions.
- Certain governments that are subject to sanctions or other business restrictions (even if the whole territory is not comprehensively sanctioned).
- Persons anywhere in the world who are on restricted party lists (such as designated terrorists, weapons proliferators, drug traffickers, cyber criminals and human rights violators).



Learn more
Trade Compliance Policy



4.6 Privacy

At HERE, data is at the foundation of what we do. But we know there are people behind that data, and we always respect their privacy by collecting their personal data in an open and transparent way and providing fair choices on its collection and use. The customer data we collect, use, hold and process is handled responsibly and lawfully. We apply privacy management measures and monitor compliance with our commitments. We build privacy and security into the design of our products and services and employ safeguards to protect personal data against unauthorized use.

You should carefully protect all personal data you acquire or have access to through your work with HERE. This includes personal data about HERE employees, customers, vendors, suppliers, partners and other third parties with whom we do business. You must handle and process all such personal data discreetly, confidentially and in accordance with local laws on data protection and privacy as well as HERE policies, requirements

and guidelines. Prior to sharing any personal data, you need to ensure that you have a valid legal basis for any disclosure or have obtained the necessary consents.

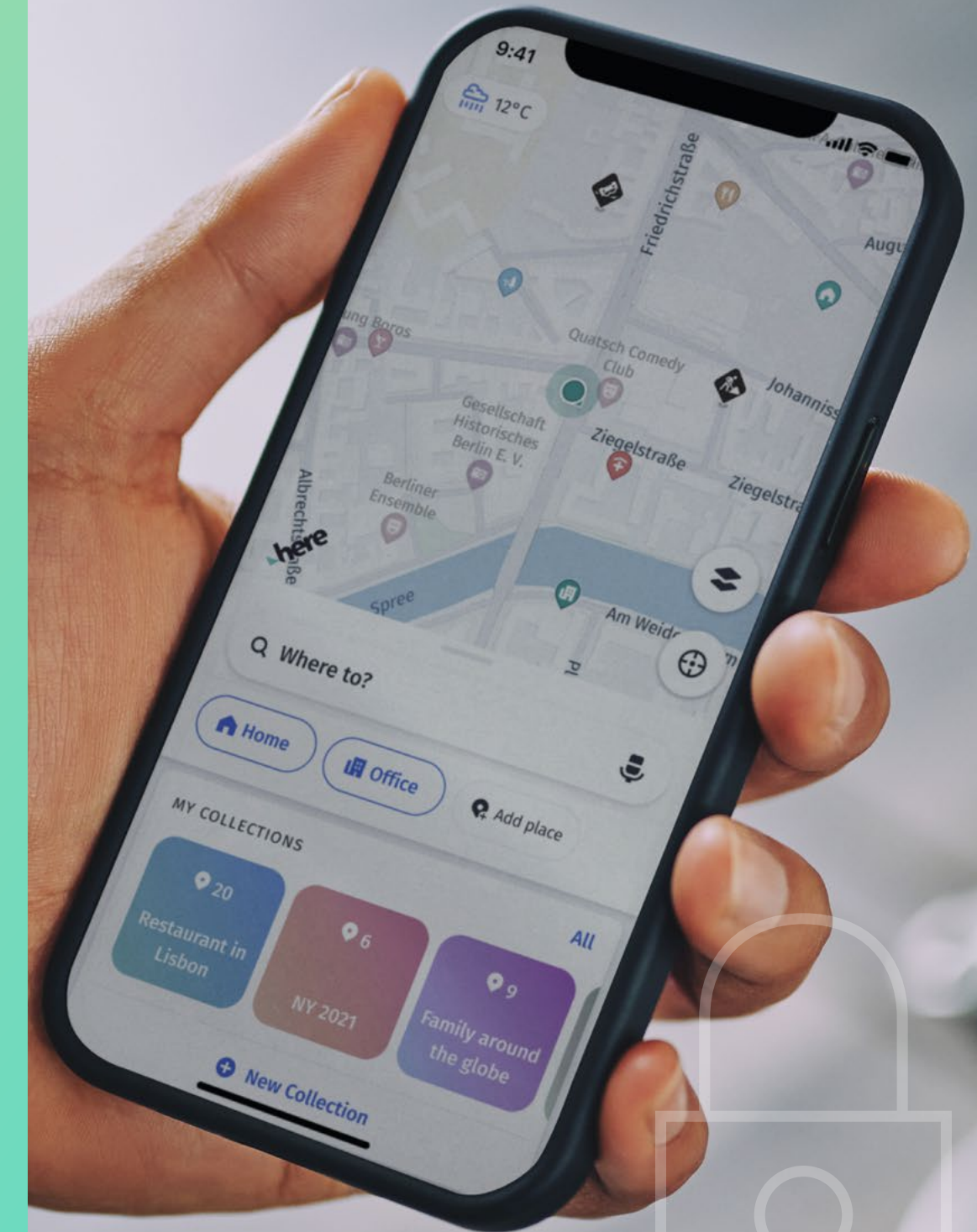
As an employee you may access and use only the personal data that is necessary to fulfill your assigned job responsibilities.

What do I need to know?

The collection, use, storage and international transfer of personal data is increasingly subject to regulation. HERE is committed to complying with all applicable data protection and privacy laws in the countries where we operate. The costs of privacy violations are substantial and in certain cases, you and HERE can be exposed to civil and criminal penalties.

Personal data includes any information that could identify an individual. This may include data about our customers, suppliers, employees and others. Personal data can include contact details, personal profiles, voice, images and the locations of individuals or their devices or applications.

Report identified privacy or security breaches or vulnerabilities to the Security team at HERE and make sure you are familiar with the privacy procedures that define our privacy vision, principles and governance model for managing privacy.



What do I need to watch out for?

Anything that doesn't follow the basic privacy and security recommendations for processing personal data:

- There must be a legitimate business purpose for any processing of personal data.
- Limit the collection and processing of personal data to the minimum that is relevant, proportional and necessary for the identified purposes.
- Ensure that you have processes and best practices for transmitting, processing, or storing personal data in protected environments.
- Properly encrypt and securely destroy unnecessary personal data based on defined retention practices and periods.
- Don't leave personal or customer data at a printer, on a shared server or on a publicly accessible computer or location.
- Don't transfer personal data between countries without addressing data protection or disclose personal data to unauthorized people or organizations.



Learn more

Employment Privacy Policy
Privacy Management Policy



4.7 Protection and proper use of company resources

We all have to do our part to be responsible stewards of HERE's resources. HERE counts on each employee to use good judgment to conserve and safeguard company assets.

Care must be taken to ensure the security and appropriate use of all assets, including information systems, technologies, physical property, facilities and equipment.

What do I need to know?

We rely on company resources to do our jobs every day.

These include, for example, HERE facilities, equipment, computers and internet access.

Company assets have to be used for legitimate business purposes only, unless otherwise determined by HERE.

Upon leaving employment with HERE, all HERE property, including keys, security badges, computer equipment, software, handbooks and internal documents must be returned.

What do I need to watch out for?

Examples of unauthorized use of HERE resources include:

- Theft, waste and abuse of company resources or funds.
- Selling, lending, giving away, or disposing of HERE property without proper authorization.

- Borrowing or removing HERE resources from company premises without proper authorization.
- Using HERE resources to support a personal business, consulting work or outside fundraising activity.

Learn more

- Information Security Policy
- Employee Security Policy
- Computer Policy
- Mobile Device Policy
- HR Policies and Procedures



4.8 Management of company intellectual property and confidential information

After our employees, innovation and intellectual property are HERE's most critical assets. To safeguard the company's future, our intellectual property and customer data must be carefully protected. We must also respect and protect the intellectual property and confidential information of external parties with the same protections we provide our own data. This includes patents, software, copyrighted materials, know-how and trade secrets, brands and trademarks.

What do I need to know?

→ When dealing with intellectual property, trade secrets or confidential information, ask yourself these questions:

- Who owns this data or information?
 - Am I authorized to use the data or information in question?
 - With whom may I share the data or information?
 - How do I protect the data or information?
 - Am I still allowed to use the data or information, or have the terms of my licensed use expired? If so, is there any action I need to take?
- Protect HERE and customer confidential information and trade secrets from unauthorized disclosure and misuse and don't share them with third parties except under approved confidentiality terms or where required by law (e.g. with valid and current non-disclosure agreement).
- Take care when using your personal social media account(s) or when writing in technical forums or other publicly accessible parts of the internet, that it is clear that you are acting in your personal capacity and not communicating on behalf of HERE and never disclose HERE confidential information.
- Do not trade on confidential inside information.

Inside information is material information about a publicly traded company that isn't known to the public. Information is "material" if a reasonable investor would attach importance to the information in deciding whether to buy, sell, or hold the stock or if the information could cause a change in its market price. If you obtain material, nonpublic information related to our suppliers, customers, or any other public company, as a result of your employment with HERE, you are prohibited by law and HERE policy from buying or selling stock based on that information. You are also prohibited from communicating such information to others who might trade on the basis of that information (such communication is called "tipping").

→ Business-related data is HERE's property and may be accessed, preserved and reviewed in accordance with HERE policies and applicable laws. This means that HERE computers, systems, resources and employee personal devices used for business purposes may be monitored or imaged for legal preservation to the extent permitted by applicable law.



What do I need to watch out for?

Theft, misuse or misappropriation of intellectual property – either of HERE or a third party – can expose both you and HERE to civil lawsuits and damages, as well as criminal liability. Special attention should be paid to the following:

- Obtaining or using ideas, materials or information of another person/company without proper authorization.
- Copying or using images, open-source software, unsolicited ideas from outsiders or written material obtained from online sources or third parties. HERE has an established process for the use of open-source software, described in the Open Source Software Policy, that must be followed.
- Giving licenses, rights or access to our intellectual property or other information without authorization or accepting a third party's intellectual property or confidential information without consulting the HERE Legal team.
- Using non-approved devices or tools, misusing approved devices or tools, or sharing your credentials, passwords, tools or equipment – all of which could lead to loss of intellectual property or damage to our IT systems.
- Misuse of HERE and customer intellectual property

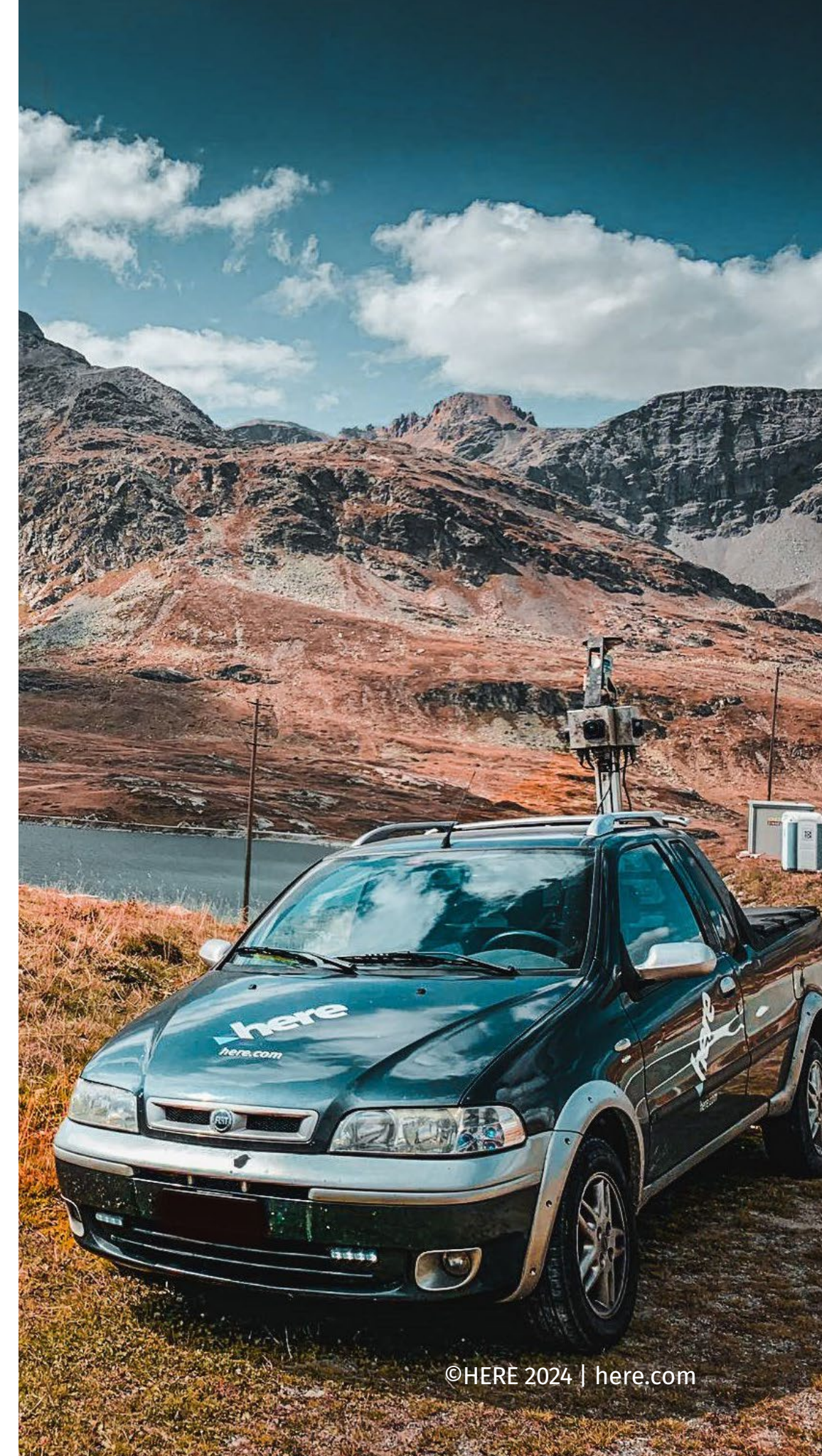
and confidential information or finding that others have reverse-engineered HERE patented products, processes, services or designs. Report such misuse immediately to the HERE Legal team.

- Employing someone who may have worked for a competitor without implementing safeguards to prevent the new employee from inadvertently disclosing the intellectual property or confidential information of others.
- Using social media for confidential, substantive or direct HERE business communication with customers.
- Disclosing confidential information through any social media platform or using photography or video content on social media in violation of the intellectual property rights of others.

In case of any doubts, please contact the HERE Legal team for help.

Learn more

- Information Security Policy
- Employee Security Policy
- Computer Policy
- Mobile Device Policy
- Open Source Software Policy



Give Back and Win Together.

We promote a culture of integrity through mutual respect, trust and highly ethical behavior.





4.9 Fair employment

HERE couldn't have gotten to where it is today without people like you. Our employees are our future. We believe in fostering a diverse, dynamic workforce and maintaining a culture of mutual respect.

Your health and safety are important to us. We aim to cultivate a balanced and supportive workplace that promotes the well-being and inclusion of every team member, possesses a culture of respect and offers challenging and inspiring opportunities for individual and collective achievement.

What do I need to know?

- HERE is committed to maintaining a culture of diversity and makes all employment decisions based on a principle of mutual respect and dignity consistent with applicable laws. HERE strictly prohibits discrimination or harassment of any kind on the basis of the person's legally protected characteristics or status.
- HERE issues and regularly validates global and local Human Resource (HR) policies, procedures and practices to regulate individual areas within Human Resource Management, ensure fair employment and comply with applicable laws.
- We all are responsible for ensuring that:
 - Everyone at HERE is treated with respect and given fair consideration.
 - All employment decisions are made based on job qualifications and any legally required criteria, without regard for a person's individual characteristics prohibited by law.

What do I need to watch out for?

- Requests or attempts internally or by third parties to compromise or subvert the HERE HR global and local policies and procedures.
- Hiring or promoting practices that don't follow our approved processes or aren't based on individual merit.
- Creating a hostile work environment, discrimination, harassment, bullying or similar offensive conduct (e.g. making jokes or displaying materials that are offensive to an ethnic, racial or gender group).
- Failing to observe labor laws and rules where you work; for example, concerning wages, work hours, privacy, immigration and collective bargaining.

Learn more

[HR Policies and Procedures](#)



4.10 Human rights

We are committed to the principles of The Universal Declaration of Human Rights and the United Nations' Global Compact. We don't tolerate, contribute to, or facilitate any activity that restricts, conflicts with or violates human rights or the right to exercise these rights.

What do I need to know?

- HERE conducts due diligence in the pre-sales process and follows the applicable laws and international standards to support human rights and participates in industry initiatives to help ensure that our products are used to enhance, and not infringe upon, human rights.
- HERE doesn't tolerate child or forced labor of any kind.
- HERE conducts due diligence on suppliers and

business partners to ensure they share HERE's commitment to human rights.

What do I need to watch out for?

- Requests for subscriber data beyond that which is provided in the normal course of business in instances that HERE hosts the network.
- Suppliers or contractors who appear to employ underage workers, engage in forced labor practices or don't maintain safe or healthy workplaces.

Be particularly sensitive when conducting business in countries where human rights abuses are known to have occurred.

Learn more
Human Rights Policy





4.11 Environment

Earth is the home we all share. To safeguard its future for many generations to come, we are fully committed to doing our part to protect the environment. This means managing environmental issues actively, openly and ethically, and complying with all applicable environmental laws and regulatory requirements.

What do I need to know?

Be aware of the environmental impacts relevant to your work and how the specific legal requirements are met in the function where you work. Where incidents, audits and feedback highlight areas for improvement in HERE's environmental management, you should immediately report the situation.

What do I need to watch out for?

→ Neglecting to promptly address environmental complaints or concerns from employees, suppliers, customers or other third parties or comply with

applicable environmental regulations and company guidelines.

→ Failing to obtain, maintain, renew and/or extend all environmental permits, licenses or other clearances (such as environmental impact studies) on a timely basis as necessary for our operations.

Learn more

Environment, Health and Safety Policy



4.12 Health, safety and labor conditions

We are expected to follow all safety rules and practices, cooperate with officials who enforce these rules and practices and immediately report all accidents, injuries and unsafe practices or conditions.

What do I need to know?

All HERE employees are responsible for ensuring healthy, safe and fair working conditions for the benefit of everyone.

Occupational health and safety management is integrated into our business and processes. We continually improve our health and safety performance through risk management, prevention of work-related accidents and the spread of communicable diseases and implementation of new working practices and technologies.

What do I need to watch out for?

- Situations that could be dangerous. Make sure that we have proper processes in place or notify your workplace resources manager, line manager or site leader.
- Anyone who disregards our policies, legal requirements or otherwise acts in a way that places others at risk, such as a manager requesting anyone to work when not fit for duty.



Learn more

HR Policies and Procedures
Environment, Health and Safety Policy

4.13 Working with suppliers, partners and other third parties

Good relationships are good for business. We strive to have solid, ethical and transparent relationships with our suppliers, vendors and other business partners to strengthen the HERE network.

All those we work with are expected to have the same high ethical standards that we do, to share the values expressed in our Code of Conduct and follow all relevant laws and regulations. We must take care in engaging others to provide services to HERE or to act on our behalf. And we must ensure that those parties share our values and are subject to sufficient review and oversight to be sure that they are appropriate partners and that they act ethically in all their interactions with HERE and others on our behalf.

Our partners support HERE in providing industry-leading solutions and services to customers around the world. Our partners include systems integrators, cloud and software providers and other companies who integrate our products and services into their customer offering.

What do I need to know?

- HERE can be responsible for illegal or unethical conduct of those with which we do business. Dealing with unethical parties also risks damaging HERE's reputation and commitment to compliance.
- Both suppliers and partners as well as all those acting on our behalf are required to comply with applicable laws as well as the applicable Code of Conduct for third parties.
- When selecting a new supplier or partner or managing a relationship with an existing supplier or partner, we follow HERE purchasing procedures and third-party due diligence protocols. The particular procedures that apply will depend on the work that the supplier or partner will be undertaking, their location and other factors.
- To maintain transparency and openness in our interactions with suppliers and partners, we don't accept or give gifts or entertainment to anyone with whom we interact beyond what is acceptable under the Gifts & Hospitality Standard Operating Procedure.



What do I need to watch out for?

Any conduct or agreement with or among those with whom we do business which does not follow our standards and all relevant laws and regulations. In order to maintain solid, ethical and transparent relationships, you should:

- Understand our suppliers' and partners' qualifications and reputations before we engage them to work on HERE's behalf.
- Ensure that suppliers and partners are compensated fairly and commensurate to the services that they provide to or on behalf of HERE.
- Include a partner in a deal or transaction only where there is a commercial necessity and the function cannot be performed by a HERE resource.
- Never engage a partner only because we are asked to

do so by a customer, regulator, government official or any other party with which we do business.

- Never ask, suggest or accept that a supplier partner engage in any conduct that a HERE employee is prohibited from engaging in under the law, this Code or HERE's policies.
- Report any signs that a supplier or partner could be engaging in fraud, or corrupt or unethical behavior while working for or on HERE's behalf.

Learn more

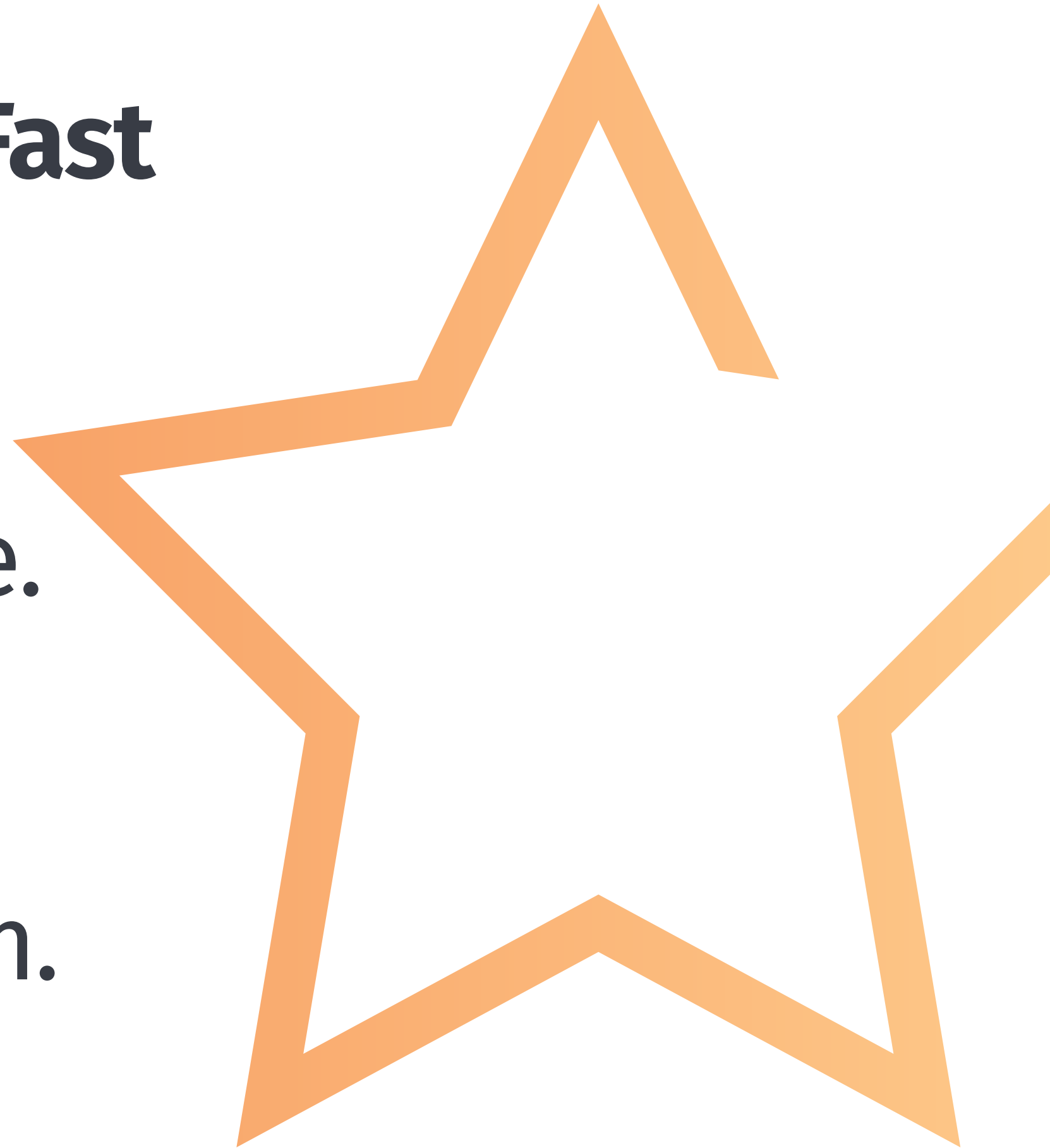
Supplier Code of Conduct

Sourcing Policy

Gifts & Hospitality Standard Operating Procedure

Be Bold, Be True, Learn Fast and Win Together.

We hold each other
accountable to this Code.
If we become aware of
potential violations,
we promptly report them.



The HERE Code of Conduct: your responsibilities

5.1 For employees

You are key to keeping our Code effective. Each HERE employee must familiarize themselves with the contents of the Code and its main principles. You should return/refer to the Code regularly as it provides guidance for the challenges you may face during your work in the complex, global environment where HERE operates.

The Code of Conduct and other corporate policies can be found on the HERE intranet's [House of Policies](#) page.



We require all employees to commit to the following:

- Read, understand and follow the Code and its principles.
- Comply with all HERE policies, procedures and laws that are applicable to your job.
- Promptly raise any and all concerns through one of the channels provided (see [“How to report concerns”](#) for further information).
- Complete any mandatory training on the Code and related policies.
- Know when to seek assistance or get more training.
- Do not retaliate against anyone for raising a concern.
- Cooperate fully and transparently in all investigations.
- Avoid any practices that may lead to unlawful conduct, an appearance of impropriety or harm the company’s reputation.





5.2 For managers

HERE managers should promote and uphold the Code within their teams. That includes being a model of ethical behavior and engaging actively with your team to create an environment in which the Code is part of your everyday workplace culture.

We require all managers to commit to the following:

- Know and anticipate business compliance risk areas that could affect your team operations.
 - Take proactive steps to mitigate risks that may affect team operations and ensure your team is trained to deal with them.
 - Communicate regularly with your team about the importance of complying with the Code and all HERE policies and procedures.
 - Emphasize the value of reporting potential issues promptly and cultivate an environment of open reporting.
- Ensure that employees feel comfortable raising concerns with no fear of retaliation.
 - Participate actively and meaningfully in upholding the Code for the company.
 - Demonstrate visibly – through your own words and actions – your personal commitment to the Code and HERE policies.
 - Report any potential violation of the Code you are aware of promptly so that it can be properly investigated by the appropriate body.



5.3 How to report concerns

Every relationship in business is built on trust. When our Code is breached, this erodes the trust we have built with our stakeholders, employees, and customers. It can harm our business and even put your colleagues at risk. Should you become aware of a potential or suspected violation of the Code it is your responsibility to raise the issue promptly. Only with the commitment and cooperation of everyone within HERE can we maintain the company's reputation and address potential issues before they have serious financial, reputational, or legal consequences.

Our Speak Up Program offers various channels to confidentially report concerns that allow a swift review and reaction by HERE if necessary. You may report concerns via the following channels:

→ **The HERE Ethics Hotline**

The HERE Ethics Hotline is available 24/7, 365 days a year, and supports both confidential and anonymous

reporting (where permitted by applicable law), via intake channels in your native language. The service is available via toll-free telephone numbers and web intake in all the countries in which HERE conducts business.

→ **The HERE Ethics & Compliance Committee**

Via email: ethicsandcompliance@here.com

Postal address:

HERE International BV
Ethics and Compliance Committee
Attn: Deputy Chairman
Kennedyplein 222, 5611ZT Eindhoven, Netherlands

In person: Please request an appointment in advance by writing an email to:

ethicsandcompliance@here.com

→ **External Ombudsman**

HERE has appointed an external counsel to act as Ombudsman. If you want to get in contact with the Ombudsman to report a concern, please send an email to: ombudsmancompliance@here.com

You may also report your concern to your line manager, any member of HERE's Management Team or the employee representative body (if any) for your location, who may, with your authorization, refer your concern to HERE's Ethics and Compliance Committee for appropriate action.





5.4 Investigation process

Every concern raised will be taken seriously. The Ethics & Compliance Committee will review and promptly address your concern, which may involve assigning a neutral party or auditor to investigate and understand the issue or investigating the matter internally. The team will track your concern from initiation to its resolution to ensure that it receives careful and thorough attention. If the investigation concludes that the HERE Code of Conduct, our policies and procedures, or an applicable law have been breached or that action is needed to remedy situations or improve HERE processes, instructions and/or ways of working, the Ethics & Compliance Committee will make recommendations regarding the appropriate corrective action or discipline. Where appropriate, we will share feedback (respecting confidentiality and subject to other legal considerations) with the person who raised the concern and lessons learned with the business.

5.5 Retaliation is prohibited

Employees who raise a Code-related concern in good faith won't face any repercussions for doing so. Anyone who retaliates against another employee for raising a concern will be in violation of the Code and may be subject to disciplinary action as described in the Discipline Policy.

5.6 Corrective action and discipline

Any violation of HERE's Code of Conduct, core values, policies and procedures may result in disciplinary actions up to and including termination of employment, subject to local law and the Discipline Policy.

Following the Code of Conduct benefits all of us at HERE by fostering a positive work environment in which ethical behavior comes naturally.



5.7 Legal consultation

HERE takes its responsibilities to comply with laws and regulations very seriously. Employees must at all times comply with laws and regulations that apply to the countries in which HERE operates. While it's impossible for anyone to know all aspects of every applicable law, you should take steps to learn and understand the laws and regulations that apply to your employment and scope of responsibilities, including those identified in this Code. Timely legal consultation is essential to ensure compliance with laws and that HERE's business interests and legal rights are protected and upheld.

If you have any questions, or if there is any potential doubt about whether an activity is legal or permitted by this Code of Conduct or other HERE policies and procedures, you must contact the HERE Legal team.

Signing and/or approving a contract or document on behalf of HERE is a big deal. You should never approve,

make changes to, or sign, a contract or document unless all of the following criteria are met:

- You are authorized to do so under the Delegation of Authority Policy. Employees and managers must never exceed or circumvent their designated authority level in agreeing or binding the company to any actions or obligations, including approving or signing documents on behalf of HERE or settling claims or legal proceedings.
- The contract has been approved by the HERE Legal team and other relevant stakeholders. If you are using an approved HERE form contract, you don't need further HERE Legal approval, unless you have made changes, or are using it for an unintended purpose.
- You have studied the contract, understood its terms, and decided that entering into the contract is in HERE's best interest.



Thank you for your commitment to making ethical choices.



About HERE Technologies

HERE has been a pioneer in mapping and location technology for almost 40 years. Today, HERE's location platform is recognized as the most complete in the industry, powering location-based products, services and custom maps for organizations and enterprises across the globe. From autonomous driving and seamless logistics to new mobility experiences, HERE allows its partners and customers to innovate while retaining control over their data and safeguarding privacy. Find out how HERE is moving the world forward at [here.com](https://www.here.com).

