

# 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 ended on December 31, 2023 - 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 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.

Together, with our customers, we work on enabling better business outcomes, while realising our vision for a more sustainable planet. We have operations in 50 countries, employing around 6,000 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. 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**

In June 2023 we updated our global Human Rights Policy that outlines our commitment to respect all international human rights across our value chain.

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

- Operates to the standard of international human rights law and applies these standards when local law falls short of international human rights standards or when there are no relevant national laws. Where local laws conflict, HERE aims to honor the principles of International Human Rights.
- Trains its people on international human rights standards and what they mean in practice.
- Conducts self-assessments based on ESG factors to identify gaps and remedy known impacts.
- Assesses ESG factors across key suppliers within our supply chain and makes recommendations for remediation, as needed; participates in our customers' supplier audits.
- Recognizes the right to freedom of association and promotes the humane treatment and non-harassment of our employees and those in our supply chain.
- Commits to non-discrimination and respects the rights of individuals belonging to groups or populations which may be particularly vulnerable to adverse impacts, including indigenous people, national or ethnic, religious and linguistic minorities, children, LGBTQ+ people, people with disabilities, and migrant workers and their families.
- Believes women's rights are human rights and commits to providing liberty, dignity, and equal rights, regardless of gender.
- Promotes the inclusion, diversity, and belonging of under-represented groups of people within our company and in society.

- Practices ethical recruiting by hiring workers lawfully and in a fair and transparent manner that respects human rights.
- Works with relevant public and private security entities to protect HERE facilities and employees in a manner that supports and reinforces respect for human rights.
- Expects suppliers who do business with HERE to uphold human rights and business ethics practices.
- Prohibits the hiring of child labour. The minimum age for full-time employment with HERE is the higher of 15 years old or the legal minimum age for employment under applicable law. Further prohibits the hiring of individuals that are under 18 for positions in which hazardous work is required.
- Adheres to fair working hours, wages and benefits in alignment with local law.
- Prohibits any form of forced labour including bonded labour, prison labour, indentured labour and slave labour, or human trafficking.
- Respects land, forest and water rights in the communities in which we operate and commit to no forced evictions.
- Provides annual reporting in alignment with the UN Global Compact principles.
- Complies with all applicable sanctions.
- Publishes an annual Modern Slavery Statement.

## **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**

HERE extends its human rights standards to every company in its supply chain through the HERE [Supplier Code of Conduct](#) and HERE's Ethical Sourcing program. HERE reviews its potential exposure to human rights risks or breaches annually, which includes a standardized questionnaire to suppliers.

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. In June 2023 we updated our Supplier Code of Conduct.

Our [Supplier Code of Conduct](#) 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. HERE Suppliers shall conduct their business in accordance with the highest ethical standards and all applicable laws and require the same compliance throughout their entire supply chain.

HERE Suppliers must not use forced, bonded, compulsory, or imprisoned labour, or allow such practices in their supply chains.

The Supplier Code of Conduct 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.

## **Flow-Through to sub-suppliers and business partners**

An important part of upholding Supplier Code of Conduct is ensuring that HERE Suppliers only do business with others that adhere to the same standards of ethics and compliance as HERE expects of its Suppliers.

Each HERE Supplier shall have a program in place to conduct due diligence, monitor and control their own business partners to help ensure that they all meet expectations consistent with those set out in Supplier Code of Conduct. HERE Suppliers may not engage in any activity prohibited by Supplier Code of Conduct by knowingly employing – or failing to impose appropriate corrective action, up to and including termination, upon a subcontractor or supplier who performs the prohibited activity on behalf of such HERE Supplier. HERE Suppliers shall never engage a sub-supplier to undertake any activity that would be prohibited by Supplier Code of Conduct or applicable law if undertaken by HERE Suppliers or their staff.

## **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.

**Approved by the management board of HERE International B.V. in Amsterdam, the Netherlands on May 30, 2024.**

Signed

By: Mr. M.G. Nefkens

Title: CEO / Managing Director

By: Mr. W.L.M. Buskermolen

Title: CHRO / Managing Director