

## STAKEHOLDER ENGAGEMENT POLICY

### PREAMBLE

At TomTom, our strategy is to deliver superior, sustainable long-term value to our stakeholders, while acting responsibly towards the planet and society. In pursuit of this objective and considering sustainability risks, opportunities, and the impact that our actions have on people and the environment, we have formulated the present Stakeholder Engagement Policy pursuant to best practice provisions 1.1.5 (*Dialogue with stakeholders*) of the Dutch Corporate Governance Code. Next to this, we have adopted a [Policy on Bilateral and Other Contacts with Shareholders](#) outlining the principles of communications with (potential) shareholders, in accordance with best practice provisions 4.2.2 (*Contacts and dialogue with shareholders*) of the Dutch Corporate Governance Code.

Understanding our stakeholders' needs, interests and expectations is of utmost importance to us. We strive to accomplish this by engaging in meaningful and continuous stakeholder dialogue. This can take many forms and involves, without limitation, regular interactions, meetings and calls with our customers and investors, industry and investor conferences, customer service, employee meetings, gathering feedback through surveys, online portals and hotlines, community outreach programmes, and engaging with government or regulatory authorities. We offer a detailed account of our engagement with stakeholders in our annual report.

## 1 INTRODUCTION

### 1.1 Status of this Stakeholder Engagement Policy

This Stakeholder Engagement Policy has been adopted by the Management Board (the "**Management Board**") of TomTom N.V. ("**TomTom**"). The Management Board holds the authority to amend, revoke, or deviate from this Stakeholder Engagement Policy at its sole discretion.

### 1.2 Scope of application

This Stakeholder Engagement Policy applies to TomTom and its group companies (the "**Group**"), however region, business unit, or stakeholder specific policies on stakeholder engagement may apply in addition to this Stakeholder Engagement Policy.

### 1.3 No third party rights

Nothing expressed or referred to in this Stakeholder Engagement Policy will be construed to give any person any legal right or claim under or with respect to this Stakeholder Engagement Policy.<sup>1</sup>

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<sup>1</sup> In accordance with the explanatory note to Best Practice Provision 1.1.5 of the Dutch Corporate Governance Code, it is up to the Management Board to determine on a case-by-case basis who the relevant Stakeholders are; Stakeholders do not have a right of dialogue with the company.

## 2 PURPOSE OF THE ENGAGEMENT

### 2.1 General purpose

- 2.1.1 Stakeholder engagement is conducted to promptly identify sustainability matters that are relevant to TomTom's stakeholders (the "**Stakeholders**"). It also aims to ensure that Stakeholders' interests are taken into account when shaping TomTom sustainable long-term value creation strategy.
- 2.1.2 Stakeholder engagement may also serve a variety of other objectives, including, but not limited to enhancing our overall performance, expanding our knowledge base, and fostering our social and relationship capital.

### 2.2 Specific purpose to be defined by the Engagement Owner

- 2.2.1 Stakeholder engagement process will be initiated and conducted on behalf of TomTom by the Management Board, or a representative designated by or on behalf of the Management Board (the "**Engagement Owner**").
- 2.2.2 Prior to commencing Stakeholder engagement, the Engagement Owner defines its initial purpose, which may be subject to review and potential adjustments during the engagement process. Modifications to the purpose of the engagement are made with due consideration of the perspectives and input provided by the respective stakeholders.

## 3 IDENTIFICATION OF RELEVANT STAKEHOLDERS AND ENGAGEMENT COUNTERPARTIES

### 3.1 Stakeholder mapping

The Engagement Owner will determine relevant Stakeholders with regard to the subject of a particular engagement, taking into account the criteria set out in paragraph 3.2.

### 3.2 Attributes of Stakeholders

- 3.2.1 In identifying relevant Stakeholders, the Engagement Owner will consider, among others, the following attributes of potential Stakeholders:
  - (a) **Dependency** – groups or individuals who are directly or indirectly dependent on the Group's activities, products or services and associated performance, or on whom the Group is dependent in order to operate;
  - (b) **Interests** – groups or individuals who have concerns, needs, desires or objectives in relation to the Group's activities, products, services, and associated performance;
  - (c) **Responsibility** – groups or individuals to whom the Group has, or in the future may have, legal, commercial, operational, or ethical/moral responsibilities;
  - (d) **Tension** – groups or individuals who need attention from the Group with regard to financial, wider economic, social or environmental issues;

- (e) **Influence** – groups or individuals who may have an impact on the Group's strategic or operational decision-making; and
- (f) **Diverse perspectives** – groups or individuals whose different views can lead to a new understanding of the situation and the identification of opportunities for action that may not otherwise occur.

3.2.2 An ongoing conversation with our Stakeholders has enabled us to identify distinct Stakeholder groups, each with its own unique set of concerns and interests vested in TomTom:

**Employees** – our employees play a pivotal role in shaping TomTom's performance, and we actively engage them in dialogues around sustainability topics. This includes conducting regular consultations with the Works Councils, seeking employees' feedback through engagement surveys, and fostering an ongoing dialogue between employees and management regarding their contributions and development.

**Investors** – given that TomTom stock is publicly traded and attracts a wide range of investors, we maintain consistent engagement with this Stakeholder group. We achieve this through a variety of events such as the Capital Markets Day and the Annual General Meeting. We participate in investor conferences, host meetings with analysts, and collaborate with proxy organizations such as VEB, Eumedion, ISS and others.

**Customers (B2B and End Customers)** – understanding the significance of secure products, data privacy, and technologies that promote sustainability and road safety to our customers, we maintain continuous communication. Our engagement includes interaction with account and product management teams, as well as ongoing support from our engineering and customer service;

**Suppliers** - suppliers play a crucial role in realizing TomTom's vision and objectives, and their profitability often relies on our procurement. We engage with them primarily through discussions and negotiations facilitated by our procurement and legal teams;

**Local communities** – we are committed to contributing to the well-being of the communities in which TomTom operates. To achieve this, we actively monitor public perception of TomTom and actively participate in discussions and initiatives where our technologies can positively impact local communities;

**Governments** – we engage in constructive dialogues with local governments and regulatory bodies to ensure compliance with various requirements, including responsible remuneration, ethical business practices, and the adherence to applicable regulations governing our products and technologies.

**Open Street Map (OSM) communities** – we are dedicated to contributing to the well-being of the OSM communities within which TomTom operates and obtains source material. In pursuit of this commitment, we proactively monitor the public perception of TomTom and engage actively in discussions and initiatives where our technologies can make a positive contribution to local communities and the OSM map.

**Partners** – TomTom actively collaborates not only with its customers and governmental agencies, but also with data resellers and map enthusiasts to collectively find ways to enhance TomTom maps. Be it through direct map feedback,

shared individually or in bulk, GPS traces, or vehicle sensor data, or by enabling trained and legally licensed Map Editing Partners to directly access our map content via a community editing portal where they can contribute in real time to improving or expanding TomTom map content around the world.

The list of relevant Stakeholder groups provided above is not exhaustive and may be periodically reviewed during the double-materiality assessment process. Details regarding the process and the outcomes of this materiality assessment will be disclosed in TomTom's annual reports.

### 3.3 Engagement Counterparty identification

3.3.1 Prior to commencing the engagement, the Engagement Owner will identify from among the identified Stakeholders a suitable party for the engagement (the "**Engagement Counterparty**"). In identifying potential Engagement Counterparties, the Engagement Owner may consider, without limitation, the following elements:

- (a) the Stakeholder engagement risks as further described in paragraph 5;
- (b) the interests of the potential Engagement Counterparty;
- (c) the expertise of the potential Engagement Counterparty;
- (d) the level of influence of the potential Engagement Counterparty;
- (e) the reputation of the potential Engagement Counterparty;
- (f) earlier experiences with the Engagement Counterparty;
- (g) the willingness of the potential Engagement Counterparty to engage; and
- (h) the potential Engagement Counterparty's expectations of the engagement.

Those who, through regulation, custom, culture or reputation, can legitimately claim to represent any Stakeholder interests as well as the interests of the voiceless, such as future generations and the environment may also qualify as Engagement Counterparty.

### 3.4. Employee participation body as an Engagement Counterparty

If warranted and notwithstanding statutory obligations to do so, the Engagement Owner may identify employee participation bodies of the Group as an Engagement Counterparty.

## 4 ENGAGEMENT METHODS

### 4.1 Engagement Method

The Engagement Owner shall determine the method(s) of engaging with the Engagement Counterparty that are best suited to the purpose of the engagement and to the Engagement Counterparty. The engagement methods may include, without limitation: written correspondence, one-on-one interviews, roundtables and expert meetings, customer and

investor meetings and calls, industry and investor conferences, customer service, employee meetings, portals and hotlines, community outreach programs, and governmental or regulatory interactions.

#### **4.2 TomTom representative**

The Engagement Owner shall determine the individual(s) to represent TomTom in a given stakeholder engagement, considering their expertise, background, seniority, and authority to take decisions.

### **5 ENGAGEMENT RISKS**

5.1.1 The Engagement Owner shall assess potential risks associated with the engagement, prior to selecting the Engagement Counterparty, and the scope and method of the engagement.

5.1.2 Based on such assessment, the Engagement Owner will determine whether the engagement is in the interest of TomTom and the Group. If it is not, the engagement will not be entered into.

5.1.3 Potential Engagement Counterparty related risks may include, without limitation, participation fatigue, having expectations that the Group is unable to fulfil, lack of trust, unwillingness to engage, conflicting interests between Engagement Counterparties and technical or other practical barriers.

5.1.4 Group related risks may include, without limitation, damage to reputation, waste of time and financial resources, loss of control of issues, creation of conflicts of interest, raising expectations that the Group is unable to fulfil, and non-compliance with legal requirements and internal policies and standards.

### **6 ONGOING MONITORING**

The Management Board shall systematically monitor and evaluate the overall quality of the engagement, and the Engagement Owner shall evaluate the quality of individual engagements.

### **7 DISCLOSURE OF INFORMATION**

7.1.1 To ensure an effective engagement and in order to assure that the Engagement Counterparty receives sufficient, consistent and timely information, the Engagement Owner shall disclose information in an accurate, transparent and comprehensive manner. The Engagement Counterparty shall be requested to adhere to the same principles with regard to the disclosure of information to the Engagement Owner. Disclosure of information by the Engagement Owner shall at all times be in compliance with legal requirements and internal policies and standards.

7.1.2 The Engagement Owner shall not disclose inside information as referred to in article 7(1) of the Market Abuse Regulation, commercially sensitive information or information that is confidential for other reasons to the Engagement Counterparty.

## **8 DOCUMENTING AND PUBLIC REPORTING**

### **8.1 Documenting of engagement outputs**

- 8.1.1 The Engagement Owner shall document the engagement and its outputs in any format deemed appropriate based on the nature of the engagement, and where appropriate develop an action plan that articulates how TomTom will respond to the outputs of the engagement.
- 8.1.2 If considered appropriate by the Engagement Owner, the Engagement Owner may communicate the key elements of the report and action plan to the Engagement Counterparty.

### **8.2 Public reporting on Stakeholder engagements**

- 8.2.1 In its annual report, TomTom may publicly report on its engagements to give insight into the scope and breadth of the outreach, and to demonstrate how the engagements contributed value to the Group's strategy and operations, all subject to the reporting framework applicable to the Group.

### **8.3 Reporting on the engagement by the Engagement Counterparty**

As a condition to entering into the engagement process, the Engagement Owner may request the Engagement Counterparty to commit that such Engagement Counterparty shall not publicly report on the engagement without the prior written consent of the Engagement Owner.

This Stakeholder Engagement Policy will be reviewed once every two years to ensure its relevance and effectiveness in guiding our efforts in maintaining a continuous and meaningful dialogue with our Stakeholders.

Amsterdam,

07 December 2023