

# **CODE OF CONDUCT**

## **POLICY**

## SUMMARY OF KEY PRINCIPLES

To promote a culture of integrity, fairness and accountability, everyone in TomTom must follow these principles:

### 1. **Treat everyone with respect**

We are committed to fostering a safe, inclusive, and respectful workplace.

- Promote psychological safety and cultural sensitivity.
- Do not tolerate discrimination, harassment, bullying, or other inappropriate behaviour.

### 2. **Act with fairness and integrity in all business dealings**

We uphold the highest ethical standards in every interaction.

- Work only with business partners who share our values.
- Avoid conflicts of interest and comply with anti-bribery laws.
- Compete fairly and follow market competition rules.

### 3. **Protect TomTom's assets and confidential information**

We safeguard what drives our innovation and trust.

- Use company resources, AI tooling and social media responsibly.
- Protect confidential and personal data, follow information security best practices.
- Prevent fraud, theft, and misuse of inside information.

### 4. **Speak up to report violations**

We all share responsibility to maintain our ethical culture.

- Report violations or concerns via the most suitable channel, including Open Ears.
- Retaliation against good-faith reporting is not tolerated.
- Making false allegations intentionally may lead to disciplinary action.

## Message from our Management Board

At TomTom, we create maps and location technology that keep the world moving. Our global team is united by shared values: openness, collaboration, and integrity.

These values guide our daily actions and decisions. In our industry, ethics and innovation go hand in hand—integrity is essential. This Code of Conduct sets the foundation for ethical behaviour and outlines four core principles:

1. **Treat** everyone with **respect**.
2. Act with **fairness and integrity** in all business dealings.
3. **Protect** our **assets** and **confidential information**.
4. **Speak up** to report violations.

Everyone at TomTom is responsible for upholding these standards. This Code provides guidance for navigating complex situations with colleagues, customers, and partners.

We trust you to act in both the letter and spirit of this Code.

*Alain De Taeye*

Member of the  
Management Board

*Harold Goddijn*

Chief Executive Officer

*Taco Titulaer*

Chief Financial Officer

## INTRODUCTION: WHY IS OUR CODE IMPORTANT?

### Understanding the Code

TomTom's Code of Conduct defines the ethical standards we uphold as a global company with a diverse workforce comprising individuals from various countries and cultures. It reflects our commitment to integrity, fairness, and professionalism in all interactions with colleagues, customers, suppliers, and partners.

The Code outlines the minimum expectations for behaviour and decision-making by upholding ethical principles. It is not exhaustive; you are expected to apply sound judgment and common sense in all situations.

### Your responsibilities

As a representative of TomTom, you are expected to make the Code an integral part of the daily business:

- Read, understand and acknowledge the Code of Conduct.
- Lead by example and uphold the core principles:
  - **Treat** everyone with **respect**.
  - Act with **fairness and integrity** in all business dealings.
  - **Protect** our **assets** and **confidential information**.
  - **Speak up** to report violations.
- Complete required Code of Conduct compliance trainings.
- Report any suspected violations.

As a manager, you are expected to play a critical role in upholding the ethical standards and fostering a culture of integrity and inclusion:

- Demonstrate ethical behaviour in every decision and interaction, especially to:
  - avoid conflicts of interest.
  - use your authority responsibly.
- Promote openness and inclusion by creating a safe environment.
- Ensure your team understands and adheres to the Code of Conduct.
- Respond to violations by addressing issues promptly and appropriately.

### **Who must follow the Code?**

The Code of Conduct applies to:

- All TomTom employees regardless of the type of contract.
- Contractors and interns working with TomTom.

It's important to note that laws and regulations may supplement the Code of Conduct.

### **Consequences of violations**

Violations of the Code are taken seriously and may result in disciplinary action, including training, warnings, demotion, or termination. For more details, refer to our Disciplinary process.

If you have any questions, contact your manager, HR or the Compliance team ([compliance@tomtom.com](mailto:compliance@tomtom.com)).

## TREAT EVERYONE WITH RESPECT

### Fair and equal treatment

At TomTom, we value diversity and strive to create a safe, inclusive, and respectful workplace where everyone can contribute fully. We foster a professional working environment where we expect all employees to treat one another with respect, constructive communication, and sensitivity for cultural and gender differences, leading to better overall results.

### Safe and respectful work environment

We expect everyone to contribute to psychologically safe work environment. Any form of inappropriate behaviour - such as bullying, abuse of power, harassment, sexual intimidation, humiliation, violent behaviour, offensive language and retaliation – is not tolerated and may lead to disciplinary sanctions. We comply with all applicable health and safety laws and have procedures in place to prevent and manage workplace incidents.

### Zero tolerance for discrimination

TomTom does not tolerate discrimination, harassment, or nepotism. Employment decisions must be based solely on qualifications, skills, and business needs - never on sole personal characteristics such as race, gender, or background.

### Examples

Here are illustrative examples of inappropriate behaviour that could violate the Code of Conduct (*please note that this list is not exhaustive*):

**Example 1 – Cultural insensitivity:** during a meeting, an individual mimics by way of joke a person from a certain cultural group in a stereotypical manner. This is perceived as humiliating and offensive by other participants, including employees who do not share the same background. Even without the intention to cause harm, every employee must refrain from this kind of behaviour. Sensitivity is also expected regarding differences based on gender.

**Example 2 – Biased performance assessment:** a manager flags an employee as an underperformer solely based on personal bias or assumptions – such as linking performance to ethnicity – rather than using objective criteria. This situation is discriminatory and unacceptable as performance reviews must be fair and evidence-based.

**Example 3 – Misuse of authority:** a manager asks a direct report to do a personal favor by dog-sitting during the holidays. Although the direct report agrees – due to a trusting personal relationship – the request itself is inappropriate. Managers must avoid any behaviour that could be perceived as favoritism or abuse of power by maintaining professional boundaries. Even informal or well-intentioned requests can create pressure or discomfort, especially when there is a power imbalance.

## **ACT WITH FAIRNESS AND INTERGRITY IN ALL BUSINESS DEALINGS**

### **Working with business partners**

We expect our business partners, including suppliers, to uphold the same high standards. This includes compliance with laws, regulations, and our Supplier Code of Conduct, which covers labor rights, health and safety, environmental responsibility, ethics, and compliance.

### **Fair competition**

TomTom is committed to fair and open competition. All business activities must comply with applicable competition laws. Our Guidelines for Fair Market Competition provide practical direction on lawful conduct and information sharing.

### **Avoid conflicts of interest**

Employees must maintain a high degree of professional integrity and avoid situations where personal interests - financial, personal, or otherwise - could compromise objectivity or TomTom's best interests. Refer to our Conflicts of Interest policy for guidance on what situations could give rise to these conflicts.

### **Anti-bribery and corruption**

We do not tolerate bribery or corruption in any form. Never offer, accept, or solicit anything of value to gain an unfair advantage. Our Anti-Bribery and Corruption (ABC) policy and procedure outlines how to recognize and avoid such risks. Employees may participate in political activities as private citizens, but must not use TomTom's name or resources to do so. Political donations on behalf of TomTom or using company funds are strictly prohibited. Personal political views must remain separate from your role at TomTom.

### **Gifts and hospitality**

Gifts and hospitality can support business relationships but must be handled transparently and without obligation. Regardless of value, any gift or invitation must be appropriate, openly disclosed, and not intended to influence decisions. Refer to our Gifts and hospitalities guidelines for examples and red flags.



## **PROTECT OUR ASSETS AND CONFIDENTIAL INFORMATION**

### **Use of company resources**

You must ensure responsible, professional and productive use of TomTom's information, assets, products, and services. These resources must be secured and protected to prevent loss, misuse, or unauthorized disclosure, for example by categorizing and labeling information. You must use TomTom devices in accordance with internal standards, please refer to our Security policies for guidance. Be vigilant against security threats such as phishing emails and always report security incidents. TomTom reserves the right to access and disclose individual electronic communication in accordance with applicable laws.

### **Keep information confidential**

You must protect business information and never share it without a legitimate reason, safeguarding our valuable assets which include product designs, strategic roadmaps, source code, IP, marketing plans, customer data, internal pricing information, non-public financial results, and new business opportunities. Confidential information must be labeled and only shared with authorized parties under a Non-Disclosure Agreement (NDA) is in place. Please refer to the Guidelines for Handling Business Information for more details.

### **Responsible use of AI**

You must only use AI tools that are authorized and approved under internal guidelines to prevent legal, security and privacy compliance issues. Inputting source code, personal data or confidential information is only permitted when explicitly allowed for a specific tool. Always validate AI outputs and ensure ethical, secure and compliant use. AI governance within TomTom is overseen by the AI Committee which provides guidance on the responsible development and deployment of AI. For more information, please refer to the policies on Responsible AI, AI literacy training and the AI Committee Charter.

### **Use of social media**

When engaging on social media you are expected to represent TomTom in a professional manner. Always communicate responsibly and respectfully, whether

posting on behalf of the company or in a personal capacity. Do not share confidential or sensitive information, and avoid publishing content that could harm TomTom, its employees, customers or partners. Your behaviour online should reflect the same standards expected in the workplace.

### **Protection of personal data**

To continuously improve the quality of our products, customers trust TomTom with sensitive personal data such as GPS probe data. You must protect personal data to maintain this trust. Our Privacy policies help you to comply with the GDPR and other applicable privacy regulations. Please report data breaches immediately via the Security Service portal.

### **Information security**

Our customers heavily rely on TomTom to maintain the highest standards for product safety and information security which means you must follow our accredited information security management system (ISO / IEC 27001:2022 and 27018:2019). Please refer Security policies for further guidance.

### **Fraud and theft**

You must report any incidents of fraud and theft immediately via the Open Ears procedure. Such incidents will be investigated, reported, and prosecuted as appropriate.

### **Inside information**

TomTom is a publicly listed company, which means that you must adhere to the regulations to avoid criminal offences when trading TomTom shares and stock options. Do not trade or disclose inside information which is non-public information that could significantly impact the share price. Please refer to the Inside Information policy for further guidance.

## **SPEAK UP TO REPORT VIOLATIONS**

### **When to speak up: see something, say something**

If you observe behaviours that do not align with our Code of Conduct, you are encouraged and expected to speak up. It's your responsibility to raise concerns about actual or potential violations of the Code of Conduct, TomTom policies and procedures, and applicable laws and regulations. By reporting violations, you help to protect TomTom's reputation and maintain our company culture and integrity.

If you are uncertain whether actions are ethically appropriate, ask yourself:

- ➔ Would I feel comfortable if someone did this to me?
- ➔ Do I understand the risks and potential consequences for myself, others, or TomTom?
- ➔ Is this action in line with TomTom's values and Code of Conduct?
- ➔ Would my manager, colleagues, friends or family find this acceptable?
- ➔ Would I feel comfortable explaining this situation to my manager or the EMB if this was made public on social media or on the 8 o'clock news?

If the answer to any of these questions is 'no', the activity likely violates the Code of Conduct. No one should face retaliation for raising concerns in good faith.

### **How to speak up**

If you have a concern, try to resolve the matter directly with the person involved. If that's not feasible, you can speak with your manager, another line manager, or your HR Business Partner. You can also report concerns anonymously via the [Open Ears platform](#) or by calling the Open Ears hotline. All reports are handled confidentially. If you don't feel comfortable using other channels, you can contact a member of our Open Ears Committee. For more information, please refer to our Open Ears procedure.

### **False allegations**

You must not make intentionally false claims. Misuse of the Open Ears process may lead to disciplinary action.