



TOMTOM SUPPLIER CODE OF CONDUCT

1. INTRODUCTION

TomTom believes that ethics and innovation go hand-in-hand and integrity is not a nice-to-have, but a must. Therefore, we seek to do business with parties that adhere to the same high standards as we do and require all business partners, including our suppliers, to uphold their responsibilities towards all relevant stakeholders, including the environment, by complying with applicable laws, rules and regulations, industry standards and best practices in all areas referenced in this Supplier Code of Conduct.

In particular, we expect our suppliers to abide by a high standard of business ethics and sustainability. We also expect them to support environmental, social and governance initiatives considering their unique business models and product and service offering to TomTom.

For these reasons, we have drafted this Supplier Code of Conduct "SCoC" and published it on our [tomtom.com](https://www.tomtom.com) page and have incorporated it by reference in our commercial agreements, as applicable. It outlines the minimum expected standard that the supplier should follow and is not intended to serve as an exhaustive list of requirements.

2. LABOR

TomTom believes that each supplier shall comply with all applicable employment laws, rules and regulations, respect and promote human rights, including the rights of women and minorities, as well as of indigenous people, in the supply chain, and safeguard the health, safety, and fair treatment of its workers. This means that each supplier shall at a minimum ensure that:

- 2.1** All employment relationships are voluntary, and no forced labor is being used. When an employment relationship is terminated, the supplier shall not withhold the workers' identity documents or other important documentation, unless required by law. Workers shall not be required to pay unreasonable recruitment fees for their employment.
- 2.2** Child labor is never used. "Child" means any person who has not yet reached the minimum age of employment in the country of employment or the minimum age for completing compulsory education, whichever is higher. This prohibition does not extend to legitimate workplace learning programs, compliant with law, such as internships, apprenticeships, or traineeships.
- 2.3** Working hours do not exceed the maximum set by local law, including any overtime.



- 2.4** Diversity and inclusion are fostered throughout the supply chain. Bullying, harassment, and unlawful discrimination shall be treated as zero tolerance violations.
- 2.5** Compensation paid complies with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Workers should be enabled to verify that they have received accurate compensation for their work through appropriate administrative means.
- 2.6** Freedom of association is being encouraged, in accordance with local law, including by promoting workers' rights to actively follow and participate in employee representative bodies. Workers are never retaliated against for associating or expressing their ideas and concerns on work-related topics.

3. HEALTH AND SAFETY

TomTom expects that each supplier shall safeguard a healthy and safe working environment for all its workers, including workers employed through a third party. This means that at a minimum the supplier shall ensure that:

- 3.1** A health and safety policy is implemented to safeguard and promote a safe and clean working environment.
- 3.2** Safety hazards at work are identified, assessed, and controlled through proper design safeguards, preventive (machine) maintenance, safety procedures and training. Where safety hazards cannot be fully controlled by these means, workers will receive personal protective equipment and training on risks.
- 3.3** Potential emergency situations are identified, assessed, and minimized by implementing emergency plans and response procedures, training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities and evacuation plans.
- 3.4** Procedures and systems are in place to prevent, manage, track and report occupational injury and illness, which also encourages worker reporting, classify and record illness cases, treat and investigate cases, and implement corrective actions.
- 3.5** Workers are provided with clean and easily accessible sanitary and dining facilities and potable water. Worker dormitories are maintained clean and safe, provide reasonable personal space and facilities, and allow free entry and exit access.



- 3.6** Workers are provided with appropriate workplace health and safety information and training in their local language or a language that they can understand.

4. ENVIRONMENT

We help everyone – people, cities, governments, and businesses – make smarter decisions and move into a world with less emissions from driving. Further, based on the [TomTom Environmental Policy](#), we are continually taking steps to reduce our environmental impact through our responsible internal business practices.

TomTom expects each of our suppliers to share this commitment and to:

- 4.1** Comply with all applicable environmental laws, rules and regulations, industry standards and best practices, such as those regarding hazardous materials, air and water emissions, waste, and restricted substances.
- 4.2** Obtain and maintain all required environmental permits, approvals, and registrations.
- 4.3** Reduce, control and/or eliminate pollution and waste of all types (including wastewater, energy loss, and solid waste) at the source.
- 4.4** Conserve the use of natural resources, including water, fossil fuels, minerals, and virgin forest products, and use renewable energy sources whenever possible.
- 4.5** Identify chemicals and other materials posing a hazard to humans or the environment, and label and manage such chemicals or materials to ensure their safe handling, movement, storage, use, recycling, reuse, and disposal.
- 4.6** Minimize the impact of their operations on local ecosystems, and protect biodiversity and soil quality. Use land responsibly and avoid activities that contribute to deforestation.
- 4.7** As applicable, reduce, control and/or eliminate air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations.
- 4.8** Adhere to all applicable laws, regulations and TomTom requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.
- 4.9** Reduce greenhouse gas emissions at the facility and/or corporate level, and work towards achieving carbon neutrality. Set targets for emissions reductions and regularly report on progress.



5. ETHICS AND COMPLIANCE

TomTom expects the highest standards of business ethics and commercial integrity of all suppliers. This means that each supplier shall:

- 5.1** Comply with all laws, rules and regulations, industry standards, best practices of all countries in which it operates and maintain complete transparency in its financial reporting, non-financial reporting and corporate record keeping. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
- 5.2** Implement and maintain a code of business ethics applicable to all workers and all of its own suppliers.
- 5.3** Adopt a zero-tolerance approach towards all forms, either directly or indirectly, of bribery, corruption, extortion, and embezzlement and prohibit any forms of undue or improper advantage from being promised, offered, authorized, given, or accepted. This includes anything of value, promised either directly or through a third party, to obtain or retain business but excludes legally permissible gifts and hospitalities.
- 5.4** Protect and respect own- and third-party intellectual property rights. Ensure that all parts and components used in their products are genuine and not counterfeit, and that they comply with all relevant safety and quality standards.
- 5.5** Safeguard:
 - a. customer and supplier confidential information and abide by contractual non-disclosure commitments. Suppliers shall take appropriate actions to protect such information from misuse and unauthorized disclosure and report any event of potential unauthorized disclosure to TomTom promptly.
 - b. reasonable privacy expectations of suppliers, customers, consumers, and employees and comply with privacy and information security laws and regulatory requirements whenever personal information is being processed. In addition, where suppliers process personal information on TomTom's behalf, they shall sign TomTom's Data Processing Agreement, execute the EU Standard Contractual Clauses (when required), confirm their compliance to the EU General Data Protection Regulation and undergo a supplier vetting, when required based on their risk classification.
- 5.6** Conduct operations in accordance with the standards of fair business, advertising, and competition law.



- 5.7** Protect whistleblowers acting in good faith and preserve their confidentiality and anonymity, unless prohibited by law or necessitated by the individual case.
- 5.8** As applicable, implement a policy on responsible sourcing of hardware components to conduct due diligence and reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of Congo, another adjoining country or any other country where trading practices involving conflict minerals result, directly or indirectly, in human rights abuses. This includes without limitation a requirement for the supplier to ensure that its policy aligns with the [TomTom Statement on the Responsible Sourcing of Minerals](#).
- 5.9** Comply with all relevant export controls and not deal with countries or individuals subject to economic, political or trade sanctions. Should the supplier have exposure to or be subject to any such sanctions it must notify TomTom immediately.
- 5.10** Ensure that any private or public security forces used in their operations respect human rights and do not engage in any form of violence or abuse.
- 5.11** Respect the land, forest, and water rights of local communities, and not engage in any activities that may result in forced eviction or displacement of communities.

6. MANAGEMENT SYSTEMS

TomTom has implemented a compliance management framework to ensure that our practices and operations abide by applicable laws, rules and regulations, industry standards, best practices, and contractual commitments. Our suppliers are expected to implement a similar framework, formally or informally, that, at a minimum, shall:

- 6.1** Reflect the commitment and role of senior management in environmental, social and governance topics, legal compliance, and continuous improvement hereof.
- 6.2** Allow the supplier to identify, monitor and understand applicable laws, rules and regulations, industry standards, best practices, and customer contractual requirements, including the requirements of this Code.



- 6.3** Set out the processes to identify the legal, compliance, environmental, health and safety, labour, and ethics risks in the supplier's operations and manage them via appropriate controls.
- 6.4** Commit to continuous improvement of compliance practices through periodic reassessment of compliance performance.
- 6.5** Outline the training and communication plan to implement the supplier's policies, procedures, and improvement objectives and to meet applicable legal and contractual requirements and to assess employees' understanding thereof.
- 6.6** Allow for the timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.
- 6.7** Require the creation and maintenance of appropriate documents and records to prove the above-stated practices.
- 6.8** Set out a means to pass on relevant requirements to supplier sub-contractors and downstream suppliers including as contained in this Code.

7. CONFLICT OF INTEREST

TomTom expects that its suppliers will disclose the existence of a personal or business relationship with a TomTom's employee, which could potentially lead to a conflict of interest. Conflicts of interest may arise when using business opportunities that may result for an immediate family member (spouse, domestic partner, other family member or relative) or other person working at TomTom with whom the supplier has a close (personal) relationship.

8. REPORTING AND CONSEQUENCES OF BREACHES

TomTom expects and encourages suppliers and supplier staff to report breaches of the principles of this Code promptly. To report questionable behaviour or a possible violation of this Code, suppliers are encouraged to work with their primary TomTom contact in resolving their concern. If that is not possible or appropriate, suppliers can report their complaint or concern by contacting TomTom's Compliance department at compliance@tomtom.com. TomTom will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought our advice or reported questionable behaviour or a possible violation of this Code. The type, severity, and circumstances of the breach will then be considered to agree on corrective actions to rectify the violation within a reasonable timeframe. If this Code, or applicable laws, rules and regulations, industry standards and best practices are breached, TomTom reserves



the right to terminate any agreement with the supplier and/or refer the matter to the competent authorities.

*Dated
August 2023*