

CODE OF CONDUCT

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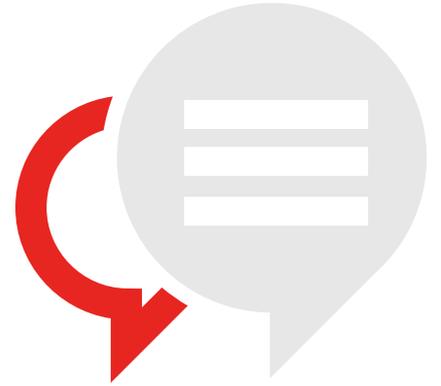
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A large, light gray speech bubble graphic is centered on a white background. Inside the bubble, the text "We need to be ethical, fair, trustworthy and reliable." is written in white. The background of the bubble is filled with a pattern of faint, light gray icons related to business, communication, and ethics, such as people silhouettes, checkmarks, speech bubbles, and arrows.

We need
to be
**ethical, fair,
trustworthy
and reliable.**

MESSAGE TO EMPLOYEES



It's not the destination, It's how we get there

We're always moving forward, and we always will be. Our boundless drive to innovate will bring us – as a global team of outstanding individuals – to lead in areas we cannot yet imagine.

What is paramount is how each of us approaches our work every day.

We are in a business where ethics and innovation go hand-in-hand, where integrity is not a nice-to-have, but a must.

We wrote this Code of Conduct so that everyone knows and can benefit from upholding our principles.



Aiming to be more

TomTom empowers movement for millions every day. Our products and services help people, bettering lives and the environment – from daily transport, to making life less stressful and reducing emissions to preserve a warming world. But overall, we need to do more.

As a company, employer and business partner, we need to be **ethical, fair, trustworthy** and **reliable**.

Our shared story is written by our individual actions, based on our shared values and passion for results.

Our Code of Conduct makes it easier for you to make swift decisions in and out of work, so that together, we can achieve more as we continue breaking future ground.

Alain De Taeye

Member of the
Management Board

Harold Goddijn

Chief Executive
Officer

Taco Titulaer

Chief Financial
Officer

INTRO- DUCTION



OUR CODE OF CONDUCT?

What is our Code of Conduct?

This Code communicates the basic principles that you and everyone else working for or with TomTom need to respect.

It cannot anticipate every situation you may encounter; nor does it remove the need for using common sense and professional judgment.

What do you have to do?

Every one of us is responsible for making it an integral part of our daily business. You can help by:

- Familiarising yourself with the Code
- Upholding the principles
- Discussing it with your colleagues
- Speaking up if you perceive any possible violation of our Code

To whom does the Code apply?

It applies to all individuals who are:

- Employed by TomTom regardless of the type of contract (temporary, fixed, at will)
- Contractors working for any TomTom company

Of course, wherever laws and regulations are more restrictive than our Code of Conduct, those laws and regulations prevail.

If you are in any doubt, you can seek guidance from your manager or legal counsel.

We create the
safest and
most **pleasant**
working
environment
possible.

PERSONAL INTEGRITY



CREATING THE IDEAL WORKPLACE

Equal and fair treatment

We want to attract the best talents and commit to enabling you to develop your abilities. We want to retain and motivate you by providing fair, competitive and responsible compensation, as well as the career opportunities you want and the challenging work you need to feel fulfilled.

Our managers must supervise their people effectively and create an organisation where processes and employment policies function effectively and you can succeed in your work.

Zero tolerance for discrimination

Absolutely no form of harassment, nepotism or unlawful discrimination based on race, gender, pregnancy or any other prejudices, is tolerated at TomTom.

All employment decisions must be based on people's skills and qualifications, relevant legal requirements and the requirements of the available position. Whether it's recruitment, hiring, promotion, compensation, or learning and development, all decisions should be carried out in a completely unbiased way.



Safe working environment

We comply with all applicable health and safety laws as relevant to the workplace. We will go beyond this, wherever we can, to create the safest and most pleasant working environment possible.

Conflicts of interest

We ask that you maintain a high degree of integrity and intelligent judgement whenever you're conducting TomTom's business. If you notice a conflict of interest with other colleagues, you should report this situation to your manager, legal counsel or through our Open Ears Policy.

We are
committed to
the principle
of free but
fair market
competition.

COMMERCIAL INTEGRITY



THE ETHICAL WAY WE WANT TO DO BUSINESS

➤ See TomTom
Responsible
Business
Alliance (RBA)
Code of Conduct

Business partners

We must seek to do business with parties that adhere to the same high standards as we do. We ask all our partners to uphold their responsibilities towards their stakeholders including the environment by signing our RBA Code of Conduct.

➤ See our
Guidelines for
Competition Law
Compliance &
Product Reviews

Fair market competition

We are committed to the principle of free but fair market competition. Always conduct business in accordance with the applicable competition laws and regulations, which are designed to ensure effective competition.

➤ See Anti-Bribery
and Corruption
Procedure

Bribery and corruption

Our position on bribery and corruption is clear; the direct or indirect offer, solicitation or acceptance of a payment in order to obtain a commercial advantage is unacceptable and forbidden. Be careful!



Gifts and hospitality

➤ See Gifts and Hospitality

You must never give or receive gifts or hospitality that might unduly influence the business decision-making processes.

That is because the use of gifts and hospitality by other parties could constitute an improper payment. However, some gifts, which are clearly not intended to obtain an advantage, may be accepted under strict conditions.

Political donations

➤ See Anti-Bribery and Corruption Procedure

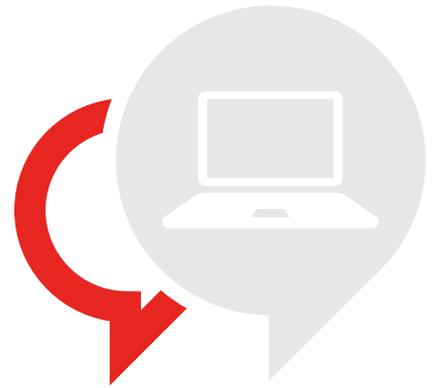
Never make political donations on behalf of TomTom or using our resources. Of course we recognise your right as an individual to participate in the political process and make political donations as you see fit, but make sure that your own political activity can never be confused with or affect your role at TomTom.



Our customers
trust us.
We must
protect their
privacy.

The background of the speech bubble contains various faint, light-grey icons related to technology and business, including a person silhouette, a cloud, a speech bubble, a checkmark, a magnifying glass, a document, a list, and a person with a checkmark.

COMPANY INTEGRITY



PROTECTING OUR COMPANY AND YOUR COLLEAGUES

➤ See Corporate
Security Policies

Use of company resources

You must ensure the proper use, protection and conservation of TomTom assets, products and services. Remember only to use opportunities arising from your position for the pursuit and achievement of company goals and never for your personal benefit.

Business information is a valuable corporate asset that must be protected and not disclosed without an authorised business reason. All online correspondence relating to TomTom, including email and social media, is also considered business information.

➤ See our
Personally
Identifiable
Information
Protection
Policy

Protection of personal data

Our customers trust us. To ensure we keep that trust, we must protect their privacy. TomTom's business model is built on community input – crowd-sourcing information provided voluntarily by our customers. If we lose their trust, our whole business model suffers. So it is in your interest to protect our customers' personal data in order for us to continue to thrive.

To make it clearer, we have formulated the following three Privacy Principles for our customers:

1. **Clarity:** We will always keep you fully informed about your data
2. **Control:** We enable you to remain in control of your data
3. **Classification:** We protect your data

For more information about our Privacy Principles, please visit our [website](#)



Security of people

Security of people requires us all to be continually vigilant. As our global presence expands, this becomes more and more important.

Information security

TomTom's digital assets and IP, as well as corporate and financial information, require adequate protection against unauthorised and unlawful access.

Our enterprise customers (including Automotive OEMs) and governments also oblige us to live up to their increasingly high requirements for information security.

With our ongoing security program, we ensure the TomTom organisation can meet its obligations and objectives towards its stakeholders with respect to (information) security. TomTom defines strategies and policies, and we monitor their implementation and execution against these.

➤ See Corporate Security Policies



Fraud and theft

► See our Open Ears Procedure

Any incidents of fraud and theft within TomTom will be promptly investigated, reported and, where appropriate, prosecuted.

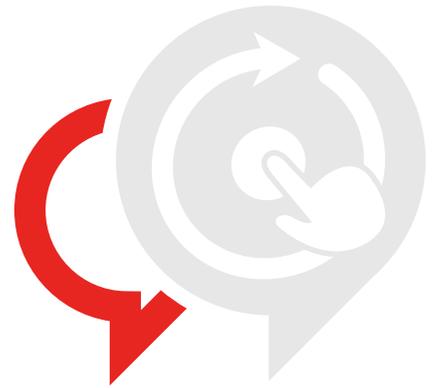
If you hear of or suspect any such conduct (including irregularities relating to financial or fiscal responsibilities), we ask you to report them immediately.

Insider information

► See Inside Information Policy

Many of us have access to TomTom-related information that is not public knowledge. If this information were made public it could influence TomTom's share price. Therefore, you must not disclose this information to third parties or trade yourself, or be perceived to trade in TomTom shares, based on this information. Please familiarise yourself with the "Inside Information Policy" and make sure you comply with it.

By reporting
misconduct,
you are
helping to
protect our
company



YOUR RESPONSIBILITIES AND SPEAKING UP

When to speak up

So what should you do if you find out that a colleague has done something contrary to the principles set out in this Code? It's your responsibility to raise any concerns about actual or even potential violations of laws and regulations, TomTom policies and procedures as well as any other suspected irregularities. By reporting misconduct, you are helping to protect our company.

How to speak up

If you have any issues you wish to raise, you should report this to your immediate manager or any other line manager. If you cannot or do not wish to discuss it with them, or if you are concerned that your manager has not acted upon your reports, you can contact our Open Ears Committee.

You can find the members of the Open Ears Committee on The Beat.

We also provide the possibility to anonymously and confidentially report ethical concerns or dilemmas via our Open Ears Hotline, available 24 hours a day, seven days a week, 365 days a year.

➤ See our
Open Ears
Procedure



False allegations

It is important to remember however, that you must not make deliberately false allegations against others where you clearly have no grounds to do so. Disciplinary measures may be taken against you if you do so.

Protection of whistleblowers

When you report your concerns via the Open Ears Hotline, you can do so securely with the knowledge that your identity will be protected. The matter will be dealt with in the strictest confidence.

NEED TO **KNOW** MORE

- Code of Conduct
- Open Ears