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CODEOF **CONDUCT**

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE TOMTOM GROUP

For the year ended 31 December 2016

TomTom's Slavery and Human Trafficking Statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015. This Statement sets out how TomTom addresses the risk of slavery and human trafficking within its own operations and supply chain.

Our business

TomTom empowers movement. Every day millions of people around the world depend on TomTom to make smarter decisions. We design and develop innovative products that make it easy for people to keep moving towards their goals. Best known for being a global leader in navigation and mapping products, TomTom also creates GPS sports watches, as well as state-of-the-art fleet management solutions and industry-leading location-based products. Our business consists of four customer-facing business units: Consumer, Automotive, Licensing and Telematics.

Our policies

TomTom's commitment to human rights is outlined in the TomTom Code of Conduct and Global Labor Principles. We also have an Open Ears Procedure in place which encourages the reporting of concerns and the protection of reporters. As a full member of the Electronic Industry Citizenship Coalition ("EICC") we are committed to upholding the EICC standards as set out in our EICC Code of Conduct which contains specific requirements covering slavery and human trafficking.

Our suppliers

Outsourcing is a key element of our business model – the assembly of PNDs, Fitness products, accessories, logistics and reverse logistics is entirely outsourced. Customer care and content production are partly outsourced.



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As a global business, we are committed to continuously improving our supply chain management practices. We have adopted and implemented the EICC Code of Conduct in our business processes and operations. This code sets out the electronic supply chain standards and practices for business conduct that we expect from our employees and our suppliers. It is embedded in our vendor selection process and is signed by all our major Tier1 suppliers.

We believe that a risk management approach enables us to spend our resources efficiently by identifying areas of high risk. The risk profile, self-assessments and audits we perform at our suppliers are all based on EICC developed tools and practices which we believe are the most appropriate and relevant to our business and our supply chain.

For more information about our corporate social responsibility activities during 2016, please refer to our 2016 Annual Report.

Training

TomTom has a continuous compliance training and awareness program in place to ensure that all employees are aware of our Code of Conduct, including human rights, and understand how to live these principles in their daily work.

