

An aerial photograph of a city street intersection. In the top right, a building with large columns is visible. A green truck is at the top left. A black car is in the middle left. A white van and a white box truck are on the right. Several yellow taxis are at the bottom. Pedestrians are walking on the sidewalks. A large orange semi-transparent shape covers the bottom left corner, containing the title and subtitle text.

here

Code of Conduct

A Roadmap for
Smart Decisions

We navigate our day-to-day responsibilities making many decisions -- some more straightforward than others.

That's what the HERE Code of Conduct is for - consider it your guide to smart and ethical decision-making, every step of the way.

Doing the right thing is part of our DNA.

From the very start, applying high ethical business standards has been integral to the success of our operations. Since our independence, it has become even more essential to maintain our already strong reputation as an ethical company that acts with integrity.

A photograph of two men playing ping pong in an office. The man on the left has a full red beard and is wearing a pink and white striped shirt, holding a black paddle. The man on the right has a brown beard and is wearing a light grey button-down shirt, holding a yellow paddle. In the foreground, a blurred orange paddle is visible. A blue sign with the text 'KEEP CALM' is partially visible in the background.

That's where you come in.

Each one of us is responsible for upholding the core principles outlined in the Code of Conduct; together, we can continue to build a positive future.

You will sometimes encounter ethical challenges and may work in environments in which standards are not as high as those we maintain at HERE.

In every instance, it is important that we stick by our core principles. Whether you're dealing with government officials, fair competition regulations, intellectual property or privacy issues, you'll find everything you need to know on the following pages.

Purpose

The HERE Code of Conduct keeps us strong and builds trust. Our customers and the communities in which we operate expect HERE to be a reliable, ethical business. Similarly, our shareholders expect us to do business the right way – earning a sound return on their investments, lawfully and ethically. Our Code of Conduct provides clear and simple directions for all employees and business partners to follow.

Applicability

We're all in this together. That means the Code of Conduct applies to everyone within HERE – directors, officers and all employees! It also applies to the directors, officers and employees of other business ventures in which HERE owns a majority of shares or exercises effective control.

HERE will make a good faith effort to implement the Code of Conduct (or a similar set of policies) in operating entities in which HERE has invested but does not own a majority of shares or control. Furthermore, we expect the principles expressed in the Code to be followed by our suppliers and other vendors.

Should there be an inconsistency between this Code of Conduct and what applicable laws require, the applicable laws will prevail.

Scope

We're keeping this simple: the Code of Conduct covers all of our business activities. It explains expected behavior and employee responsibilities, including the obligation to report any potential violations and cooperate with any subsequent investigations.

Commitment

HERE has a bright future ahead. To stay the course, at HERE we are committed to continually improving in all the areas covered by the Code of Conduct. To do so, everyone in the company needs to be on board. Without exception, any potential breaches of the Code should be reported as soon as they arise – showing us where we still need to improve.

We want everyone to feel safe and comfortable to raise issues, and will not accept any retaliation or negative actions against anyone who raises legitimate concerns in good faith.

The HERE Code of Conduct

1. We **follow the laws** of the countries where we do business, and we adhere to HERE's policies and procedures.
2. We set an example for each other and our stakeholders by being **honest and fair**.
3. We **disclose promptly any conflicts of interest** that might influence our business judgment, and avoid any appearance of impropriety in our dealings with others.
4. We promote a **culture of integrity** through mutual respect, trust and highly ethical behavior.
5. We **hold each other accountable** to this Code, and if we become aware of potential violations, we promptly report them.

The HERE Code of Conduct in practice

Improper payments and dealing with public officials

You may find yourself interacting with governments, agencies and officials during the course of your work at HERE. When navigating these encounters, it is important to follow high ethical standards and act in a transparent manner. Honesty, truthfulness and accuracy are the values we adhere to at all times.

Whenever applicable, we follow HERE policies and procedures and any relevant laws in our dealings with government officials. Special requirements apply to our interactions with governments and state-owned enterprises, including, for example, procurement, lobbying, entertainment, hospitality, disclosure and record-keeping rules.

We believe in earning business on our merits. That means improper or corrupt payments may not be made directly or indirectly to a customer, supplier, government official or any other third party. This includes facilitation or “grease” payments, improper gifts, entertainment, gratuities, favors or donations.

What do I need to know?

- Public officials include employees, agencies, and other representatives of national, regional, local and municipal governments, and employees of government-owned enterprises and anyone acting on their behalf, political candidates and employees of non-governmental organizations.
- Business practices that are acceptable in the commercial arena, such as providing hospitality or certain pre-tender sales activities, may be unacceptable or even illegal in government business.
- HERE will not participate in the political or electoral process through direct donations to political groups, but to protect our interests through lawful and transparent advocacy with government. Your personal political activity, such as support of local candidates or donations to candidates, may be appropriate, but it must be lawful, conducted on your own time, with your own resources and in no way involve or be perceived to involve HERE.
- An improper payment involves any transfer of value that is unlawful under applicable law or not permitted by customer rules or the Gift & Hospitality Standard Operating Procedure (SOP).
- Never give – or authorize a third party to give – a gratuity to a public official to expedite a service.
- Improper payments could put you and HERE at risk of criminal prosecution. Always seek advice from HERE Legal & IP team if you are uncertain about the legitimacy of any payments.
- Deviating from a government’s public procurement or tender process, even when a government official may indicate that such a deviation is acceptable or condoned.
- Recruiting a government official or member of the official’s family for employment at HERE while the official is in a position to influence our business with the government.
- Offering hospitality, entertainment or travel to government officials beyond the Gift & Hospitality SOP. Please be sure to clear any such offering with the HERE Ethics & Compliance Committee in advance.
- Requests by suppliers – especially those who deal with government officials – for high commissions, reimbursement for excessive entertainment, unauthorized travel expenses or commissions before an award.
- Requests for payments to an individual, an offshore account, or to a legal entity other than the service provider specified in a contract.
- “Fees” for which a government official will not provide a receipt.
- Requests for travel, lodging or hospitality for government officials/other customers, their family members or friends.
- Requests by a public official or customer for charitable donations with which they have an affiliation.
- Requests or directions to engage a supplier, or use a specific third party because of a “special relationship.”

What do I need to watch out for?

- Ensuring that government officials who request information from HERE have a right to such information, and that HERE has a right to deliver such information. When applicable, follow the relevant procedure or seek guidance from the HERE Legal & IP team.
- Deviating from contract requirements when providing goods or services to a government or government-owned enterprise.
- Providing information to a government official without first conducting due diligence to verify that all such information is current, accurate and complete.
- Any service provider that suggests unusually “fast” clearance of goods through customs, visas or work permits through immigration, or issuance of government permits.
- Requests to record a transaction inaccurately or incompletely, or expedite approvals or payments in a way that might compromise financial controls.
- Payment requests for “vague” goods or services, or when the deliverables are uncertain or unclear.

Conflicts of interest

We all have personal lives outside of work, and there may be situations when the interests of HERE and your personal interests collide. This is what's called a conflict of interest, and such conflicts may affect our judgment or give an appearance of impropriety. A conflict of interest is not necessarily a problem, but could become one if not promptly disclosed and properly managed. It is critical to come forward as soon as a conflict of interest or the appearance of a conflict of interest arises.

What do I need to know?

- A conflict of interest includes both actual conflicts as well as perceived ones.
- A conflict of interest that is not properly disclosed and managed will cause others to question your integrity and loyalty to HERE.
- Remember that the interests of your family members, close personal friends and other such relationships could give rise to conflicts of interest.
- You must promptly declare to HERE that there is a conflict of interest or a potential conflict of interest in accordance with the HERE Conflicts of Interest Policy and the underlying Standard Operating Procedures.
- We are all expected to act in the best interest of HERE, and use HERE property and resources exclusively for HERE's benefit. This means avoiding any activity at work or at home that might hurt the good reputation of HERE.

What do I need to watch out for?

- Business decisions in which the parties have close personal or family relationships with you, or where you or your family might stand to personally benefit.
- Discounts, gifts, payments or other benefits from suppliers, customers or others who conduct or want to conduct business with HERE.
- Recruiting, hiring, or directly supervising family members or personal friends, or promoting someone with whom you have such a relationship.
- Performing outside work during HERE business hours or using HERE resources, intellectual property or confidential information for work not related to your responsibilities at HERE.
- Being an officer or director of a charitable or civic organization that may obtain (or seek to obtain) funding or support from HERE.

Fair competition

Our business is a tough one. We work hard to achieve our goals, but we also believe in competing fairly. In most countries, business activities are regulated by competition or antitrust laws. These laws restrict the behavior of dominant companies and prohibit agreements or understandings among competitors that undermine competition. They also require advance permission for mergers, acquisitions or other combinations of companies that might reduce competition.

HERE is committed to complying with competition laws everywhere we do business.

What do I need to know?

- You have a responsibility to understand local competition laws and, where appropriate, consult the HERE Legal & IP team for guidance.
- Every employee at HERE is responsible for bringing potential or actual violations of competition laws to the attention of HERE. These are examples of potential violations that should be reported:
 - Agreeing with competitors to set prices, divide up customers, suppliers or markets, or limit production;
 - Sharing confidential or otherwise sensitive information to competitors or third parties;
 - Limiting the ability of resellers to set the resale price of our products;
 - Making exclusive deals with partners;
 - Discriminating unfairly between similarly situated customers, suppliers or partners;
 - Colluding with competitors to exclude a third party or a competitor;
 - Limiting parallel trade in unified trade areas (such as the EU).
- Companies that are considered dominant may not abuse their positions, which means that there may be more specific rules if HERE is viewed as dominant in a given market.

What do I need to watch out for?

- Sharing or communicating information either formally or informally, or otherwise aligning with competitors.
- Discussing sensitive topics such as pricing, future plans/strategy, product roadmaps, customers or production with competitors.
- Sharing HERE business secrets without your manager's approval and a non-disclosure agreement, or in any manner that conflicts with a non-disclosure agreement or is beyond what is necessary to achieve the objectives of a project in which you may be collaborating with a competitor.
- Serving on the board of a competitor.
- Entering into exclusive arrangements or non-competition agreements.
- Entering technology license agreements that may restrict the freedom of the licensee or licensor.
- Entering into joint bidding or supply arrangements, or forming a joint venture

Privacy

At HERE, data is at the foundation of what we do. But we know there are people behind that data, and we always respect their privacy.

When we collect personal data, we do so in an open and transparent way and provide fair choices on its collection and use. The customer data we collect, use, hold and process is handled responsibly and lawfully. We apply privacy management measures and monitor compliance with our commitments. We build privacy and security into the design of our products and services and employ safeguards to protect personal data against unauthorized use.

What do I need to know?

- Our commitment to respect privacy goes beyond legal compliance: managing personal data in a responsible and respectful manner is how we earn the trust of our customers.
- The costs of privacy violations are substantial, and in certain cases, you and HERE can be exposed to civil and criminal penalties.
- Personal data includes any information that could identify an individual. This may include data about our customers, suppliers, employees and others. It may include contact details, personal profiles, voice, images and locations of individuals or their devices or applications. When in doubt, treat the information as personal data.
- In contracts, our customers may impose rules on how we access, collect and handle personal data. Therefore, we must not collect, process or store personal data in way that is incompatible with our customer agreement and other privacy commitments.
- You may access and use only the personal data that is necessary to fulfill your assigned job responsibilities. There must be a legitimate business purpose for any use or sharing of that data.
- Protect personal data physically and electronically. Place personal data only on HERE authorized environments, and not on unencrypted or unsecure computers, servers or removable media, or personal cloud-based services.
- Report identified privacy or security breaches or vulnerabilities to the Security, Privacy & Continuity team at HERE, and make sure you are familiar with the privacy procedures that define our privacy vision, principles and governance model for managing privacy.

What do I need to watch out for?

- Do not store, transfer or use personal data if it is not required for a legitimate business purpose.
- Properly shred and securely destroy unnecessary personal data.
- Ensure that you have processes and best practices for transmitting, processing or storing personal data in protected environments.
- Do not leave personal or customer data at a printer, on a shared server, or on a publically accessible computer or location.
- Do not transfer personal data between countries without addressing data protection.
- Do not disclose personal data to unauthorized people or organizations.



Intellectual property and confidential information

After our employees, innovation is one of HERE's most important assets. To safeguard the company's future, our intellectual property should be carefully protected. This includes patents, software, copyrighted materials, know-how and trade secrets, brands and trademarks.

What do I need to know?

- When dealing with intellectual property or confidential information, ask yourself these questions:
 - "Who owns this? May I use it?"
 - "With whom may I share this? How do I protect its value?"
 - "Has the term of my licensed use expired? If so, is there any action I need to take?"
- Seek proper authorization and have appropriate contract terms in place before providing HERE intellectual property to a third party. For help, contact the HERE Legal & IP team.
- Protect HERE confidential information and trade secrets from unauthorized disclosure and misuse, and do not share them with third parties except under approved terms which restrict their disclosure and use.
- Respect and protect the intellectual property and confidential information of others with the same degree of care we give our own, and according to the terms of any applicable agreement.
- Theft, misuse or misappropriation of intellectual property – either of HERE or a third party – can expose both you and HERE to civil lawsuits and damages, as well as criminal liability. Violations of this policy can also lead to disciplinary action.
- Use our processes and the HERE Legal & IP team to help you properly harvest, protect and enforce intellectual property rights and confidential information.

What do I need to watch out for?

- Obtaining or using the ideas, materials or information of another person/company without proper authorization. This may include copying or using images, open source software, unsolicited ideas from outsiders, or written material obtained from online sources or third parties.
- Giving licenses, rights or access to our intellectual property or other information without authorization, or accepting a third-party's intellectual property or confidential information without consulting the HERE Legal & IP team.
- Using non-approved devices or tools, misusing approved devices or tools, or sharing your credentials, passwords, tools, or equipment – all of which could lead to loss of intellectual property or damage to our IT systems.
- Sending sensitive information to unattended printers, discussing confidential information openly when others might be able to hear, or creating written materials without labeling them according to the HERE Information Confidentiality Classification instructions.
- Misuse of HERE intellectual property or confidential information or finding that others have reverse-engineered HERE patented products, processes, services or designs. Report such misuse immediately to the HERE Legal & IP team.
- Employing someone who may have worked for a competitor without implementing safeguards to prevent the new employee from inadvertently disclosing the intellectual property or confidential information of others.
- Failing to honor your obligations under a non-disclosure agreement or invention assignment agreement between you and HERE.
- Engaging in situations in which you're not sure what to do – when in doubt, contact the HERE Legal & IP team for help.

Working with suppliers

Good relationships are good for business. Having solid, ethical and transparent relationships with our suppliers strengthens the HERE network.

Suppliers we work with are expected to have the same high standards we do, to share the values expressed in our Code of Conduct and follow all relevant laws and regulations. When selecting a new supplier or managing a relationship with an existing supplier, we follow HERE purchasing procedures. To maintain transparency and openness in our interactions with suppliers, we do not accept or give gifts or entertainment beyond the Gift & Hospitality SOP.

What do I need to know?

- Suppliers perform work or provide services on behalf of HERE, and you must take care that they do not cause harm to the good reputation of HERE. Be familiar with key purchasing policies and requirements.
- Immediately raise a concern if you are asked to select or deal with a specific supplier and/or deviate from the approved supplier selection or relationship management process.
- We will take prompt steps to shift HERE business away from suppliers whose legal or ethical performance is questionable.
- Accepting anything beyond Gift & Hospitality Standard Operating Procedure (SOP) from suppliers may result in disciplinary action, up to and including termination of employment. In addition, such actions can expose you to civil and criminal liability. You must immediately report any attempt by a supplier to provide anything of value or other consideration beyond the Gift & Hospitality SOP.
- We do not accept any gifts, entertainment or hospitality from suppliers beyond the limits outlined in the Gift & Hospitality SOP.

What do I need to watch out for?

- Being pressured to select a specific supplier – regardless of the outcome of the supplier selection process.
- Suppliers offering anything of value (e.g. hiring your relative) to be selected, maintain or increase business.
- Suppliers that resist the standards contained in HERE Supplier Requirements, including ethical behavior, labor and human rights, health and safety and the environment.
- Suppliers that do not have a code of conduct in place with policies related to ethical behavior, labor standards, sustainable business practices, quality control and safety and security, or do not commit to the provisions expressed in this Code of Conduct.
- Suppliers that do not address reasonable concerns, corrective actions or audit findings in a timely manner.
- Suppliers that claim they can meet unrealistic delivery schedules or pricing, expedite customs issues.
- Suppliers who attempt to use our good name or logo in an unauthorized manner.
- Suppliers that are owned or controlled by the government or a government official or close family member, or a supplier that claims it can exercise improper influence with the government or with a customer.
- Conflicts of interest when conducting business with suppliers, such as when someone in your family – or anyone else with whom you have a close personal relationship – has a substantial role in or relationship with a certain supplier.

Export and trade compliance

We are proud to be active in every region around the world and to deliver globalized solutions. Operating on such an international scope means delivering goods, services and technology across borders, and this activity is regulated by national and international laws that affect our operations in multiple ways.

The transmission of information and data across borders by email and the web, or even the exchange of information among citizens of different nations who are located in the same country, can fall under strict regulations.

We comply with all applicable trade compliance laws and regulations, including export controls and sanctions. We declare exports and imports – and their value – accurately and transparently to customs authorities.

What do I need to know?

- Learn the applicable trade rules when arranging any cross-border transactions, including those that are free of charge, returns or hand-carried goods.
- Check new or unknown business partners against sanctioned party lists and request assistance from the HERE Legal & IP team when dealing with especially sensitive jurisdictions.
- Obtain clear and complete answers from customers or third parties about the end use/end-user, delivery dates and locations.
- Exports can take many forms. For instance, sharing information via electronic means (e.g., email or an online collaboration site) or carrying electronics containing controlled information across borders could be considered an export.
- Many countries impose restrictions on the transfer of certain technologies and data; some even completely forbid business with certain countries. Export restrictions and sanctions may apply depending on several factors:
 - the destination country;
 - the export control relevance of hardware, software, and technology;
 - companies and people involved in international and domestic business transactions; and
 - end-use of hardware, software, or technology provided by HERE
- If you initiate exports or imports – even occasionally – you must follow the applicable laws of the country you are exporting from and the country you are importing to. All imports have to be declared accurately with correct documentation and value.
- Archive import and export documentation carefully for audit purposes.
- Improper imports or exports, or non-compliance to sanctions, can expose you and HERE to civil fines and criminal prosecution.

What do I need to watch out for?

- If you initiate imports or exports, you are responsible for following HERE policies and procedures for obtaining proper clearance.
- Take the time to learn what would be considered, by local authorities, imports and exports with the help of the HERE Legal & IP team.
- Manual shipments or hand-carrying business equipment on business trips.
- Any controlled technology transmitted by email, server access or other means.
- Payments to a customs broker that exceed the invoice, or for suspicious or unidentified services.
- Any inaccurate description, classification or valuation of goods or data on invoices, customs forms and other related documentation.
- Indications that the customer may attempt to evade applicable trade laws via transshipments to a prohibited destination.

Health, safety and labor conditions

Your health and safety are important to us. We believe that the workplace should be a balanced, supportive environment that enables the well-being of every team member. To accomplish this, we consistently implement robust processes that meet or even exceed the requirements of labor regulations, and we expect our contractors and suppliers to do the same.

What do I need to know?

- All HERE employees are responsible for ensuring healthy, safe and fair working conditions for the benefit of everyone.
- Occupational health and safety management is integrated into our business and processes - including design, production, distribution, installation and support of our product and systems.
- We continually improve our health and safety performance through risk management, prevention of work-related accidents and the spread of communicable diseases, and implementation of new working practices and technologies.
- We promote healthy lifestyles and support activities that enhance employees' health, well-being and work/life balance.
- We take immediate action to remedy situations in which incidents, audits and feedback identify areas for improvement in the management of health, safety and labor conditions.
- We expect our suppliers, contractors and other business partners follow the same standards and place equally high priority on health, safety and labor conditions in their operations.
- HERE takes this policy seriously, and may impose discipline for violations. Likewise, regulatory authorities may seek to impose civil and criminal penalties for violations of health, safety and labor condition laws.

What do I need to watch out for?

- Situations that could be dangerous. Make sure that we have proper processes in place or notify your Workplace Resources manager, line manager or site leader.
- Anyone who disregards our policies, legal requirements or otherwise acts in a way that places others at risk, such as a manager requesting anyone to work when not fit for duty.
- Look for opportunities in your daily work routines to improve safety, processes and health practices.



Controllershship

Honesty and transparency are principles we live by. So when it comes to our financial records, we take the greatest care. This means implementing controls to ensure we represent financial data accurately and consistently, protect assets, and report transactions in a timely and objective manner.

We are committed to complying with all relevant laws and regulations governing financial accounting and reporting obligations.

What do I need to know?

- It is critical to maintain complete and accurate records of HERE financial transactions and assets, including operating metrics and results, to ensure a complete audit trail.
- It is important that every employee pays close attention to the safekeeping of our financial, physical and informational assets, including intellectual property.
- When presenting business information or making financial forecasts, you should be candid and transparent.
- Before approving a transaction, verify the facts and completeness of the information, and consider the underlying business rationale for the approval.
- Cooperate fully with any external or internal audits and provide full, complete and timely answers to questions and document requests.
- Ensure that HERE's accounting procedures, as well as other applicable accounting principles and regulations are consistently followed. When in doubt, ask your line manager or a member of the Accounting team.
- Preserve records and financial information in accordance with law and with our document retention procedures.
- Misrepresenting facts, transactions or financial data is a serious matter, and can lead to civil and criminal liability for those involved and for HERE.

What do I need to watch out for?

- Financial transactions recorded in error, such as those with the wrong date, a misleading description, false expenses, purchase orders, inaccurate time sheets or vouchers.
- Any transaction that does not make fundamental business sense, decisions that are inconsistent with sound business economics, or financial results that do not appear consistent with the actual business performance.
- Any effort to avoid appropriate reviews for a transaction, or actions inconsistent with an employee's level of authority.
- Any physical assets that are not appropriately protected against loss or theft, or any effort to dispose of an asset without proper authorization.
- Any absence of controls on transactions, such as dual signatures on checks or required approvals on expenses, particularly in situations involving cash.
- Any effort to circumvent document retention requirements, particularly associated with pending or reasonably foreseeable litigation, audits or investigations.

Fair employment

HERE could not have gotten to where it is today without people like you. Our employees are our future, and we believe cultivating a diverse, dynamic workforce will continue to be one of our greatest assets.

We foster a workplace culture of respect, one which abounds with challenging opportunities for individual and collective achievement. When it comes to recruitment, retention, promotion and other employment activities, we are committed to complying with all applicable labor laws and regulations. This includes rules concerning wages, work hours, privacy, immigration, compulsory and child labor, collective bargaining and anti-discrimination regulations. To guide employment-related decision-making, we ensure employees and managers have ready access to material on internal guidelines, procedures and standards.

What do I need to know?

- Every country regulates the workplace, and HERE has appropriate employment practices and processes to comply with applicable laws, as well as our own internal guidelines, procedures and standards.
- HERE issues global and local Human Resource (HR) policies and procedures to regulate individual areas within Human Resource Management and ensure fair employment.
- Complying with legal requirements is only one part of the formula for cultivating a culture of respect in our workplace — we are all responsible for ensuring that everyone at HERE is treated with respect and given fair consideration.
- Ensure that employment decisions are based on job qualifications, without regard for a person's race, age, sex, national origin, color, disability, veteran status, sexual orientation, gender identity or expression, religion or other characteristics prohibited by law. This principle applies to all personnel actions including, but not limited to, recruitment, evaluation, selection, promotion, transfer, compensation, social and recreational programs, training, benefits, workforce reduction, termination of employment and all other terms and conditions of employment.
- Many countries have particular rules on immigration, limitations on expatriate workers, and the use of temporary workers, or secondments.
- HERE regularly validates its HR global and local policies and procedures against applicable law, and HERE employees are strongly encouraged to raise any matter that may require

What do I need to watch out for?

- Our employment standards are high and we do not waiver. Just because a particular legislation would allow or does not specifically forbid certain practices, our global policies still hold and we abide by them.
- Requests or attempts internally or by third parties to compromise or subvert the HERE HR global and local policies and procedures.
- Hiring or promoting practices that do not follow our approved processes or are not based on individual merit.
- Creating a hostile work environment, bullying or similar offensive conduct (e.g., making jokes or displaying materials that are offensive to an ethnic, racial or gender group).
- Failing to observe labor laws where you work; for example, prohibitions on child or compulsory labor, denying or limiting freedom of choice of employment.
- Taking adverse employment action against anyone who has raised a good faith concern regarding a potential violation of the HERE Code of Conduct or applicable law.

Human rights

Every individual deserves access to the same fundamental human rights. We are committed to the principles of The Universal Declaration of Human Rights and the United Nations' Global Compact, and we expect our suppliers and business partners to share these values. We seek to ensure that all materials used in our products come from socially responsible sources. We do not tolerate, contribute to, or facilitate any activity that fuels conflict or violates human rights.

HERE is committed to enabling the exercise of rights such as free expression and political participation through its products and services.

What do I need to know?

- HERE conducts due diligence in the pre-sales process and follows international standards to help ensure that our products are used to enhance, and not infringe upon, human rights.
- HERE also conducts due diligence on suppliers and business partners to ensure they share HERE's commitment to human rights.
- HERE complies with applicable laws and participates in industry initiatives to support human rights.
- Unlawful, exploitative or improper use of natural resources can expose HERE to penalties or criminal prosecution.

What do I need to watch out for?

- Be particularly sensitive when conducting business in countries where the rule of law is weak, or where the government is not a result of free and open democratic processes.
- Requests for subscriber data beyond that which is provided in the normal course of business in instances that HERE hosts the network.
- Suppliers or contractors who appear to employ underage workers, or do not maintain safe or healthy workplaces.

Environment

The earth is the home we all share. To safeguard its future for many generations to come, we are fully committed to doing our part to protect the environment. This means managing environmental issues actively, openly and ethically and meeting or even exceeding all regulatory requirements.

We embed environmental considerations into our product planning, operations, decision making and monitoring to understand impacts and continually improve. HERE is always striving to create solutions that support our customers' efforts to reduce their environmental impacts.

What do I need to know?

- HERE puts a high priority on protecting the environment. We meet or exceed all legal requirements in this area, and we expect employees, suppliers, contractors and other business partners to do the same.
- We continually examine how HERE products can help make user activities more efficient. This enables customers and users to reduce their environmental footprints.
- Be aware of the environmental impacts relevant to your work and how the specific requirements are met in the function where you work (e.g., product requirements in R&D or transportation selection in logistics).
- Take immediate action to remedy situations in which incidents, audits and feedback highlight areas for improvement in HERE's environment management.
- Be aware that non-compliance with environmental laws can lead to civil and criminal liability. In addition, HERE employees may be subject to discipline for breaches of this policy.

What do I need to watch out for?

- Failing to promptly address environmental complaints or concerns from employees, suppliers, customers or other third parties.
- Suppliers or contractors that do not engage in sound or sustainable environmental practices.
- Ignoring applicable environmental regulations or company guidelines.
- Missing opportunities to decrease the environmental impact of our products and services by reducing waste, increasing energy or material efficiency, or preventing pollution.
- Taking action on acquisitions, dispositions, or other new ventures without first conducting thorough due diligence to evaluate their environmental risks.
- Obtaining, maintaining, renewing and extending all environmental permits, licenses, or other clearances (such as environmental impact studies) on a timely basis necessary to our operations.

The HERE Code of Conduct responsibilities and policies

Your responsibilities under the HERE Code of Conduct

Each one of you is the voice of HERE, and we're counting on you to help us uphold the core values outlined in the Code of Conduct. The Code represents our commitment to act with high standards of integrity and ethics in all of our business activities.

Responsibilities for all employees

In the previous pages we have provided many examples of potential ethical challenges, but it would be impossible to list every situation you may face during the course of your complex, global work. However, being familiar with the contents of the Code and keeping it close at hand as a guide will prepare you for the challenges you may face.

We expect all employees to commit to the following:

- Read, understand and follow the Code of Conduct and its principles;
- Promptly raise any and all concerns through one of the channels provided (see page 30 for further information);
- Know when to seek assistance or get more training;
- Don't retaliate against anyone for raising a concern;
- Cooperate fully and transparently in all investigations; and
- Avoid any practices that may lead to unlawful conduct, an appearance of impropriety or harm the company's reputation.

Responsibilities for all managers

HERE managers play an important role: they carry the responsibility for fostering and upholding the Code of Conduct within their teams. As a manager, your role is to not only talk the talk, but walk the walk: be a model of ethical behavior and engage actively with your team to create an environment in which the Code of Conduct is part of your everyday workplace culture.

We expect all managers to commit to the following:

- Know and anticipate business compliance risk areas that would affect your team operations;
- Take proactive steps to mitigate risks that may affect team operations and ensure your team is trained to deal with them;
- Communicate regularly with your team about the importance of complying with the Code of Conduct;
- Emphasize the value of reporting potential issues promptly and foster an environment of open reporting;
- Ensure that employees feel comfortable raising concerns with no fear of retaliation;
- Recognize and reward employees who respect and embody Code of Conduct principles beyond the compulsory expectations outlined here;
- Allocate appropriate resources to ensure that your team follows the Code, and set goals to track performance in this regard;
- Hire and promote only those people who have high standards of integrity;
- Participate actively and meaningfully in upholding the Code of Conduct for the company; and
- Demonstrate visibly – through your own words and actions – your personal commitment to the Code of Conduct and its policies.

Raising concerns

Every relationship in business is built on trust. When our Code of Conduct is breached, this erodes the trust we have built with our stakeholders, employees and customers. It can harm our business and even put your colleagues at risk. Should you become aware of a potential or suspected violation of the Code, it is your responsibility to raise the issue promptly. Only with the commitment and cooperation of everyone within HERE can we maintain the company's reputation and address potential issues before they have serious financial, reputational or legal consequences.

A photograph of two dogs playing on a bed of brown wood mulch. A larger, white, fluffy dog is on the left, jumping or running with its mouth open in a playful bark. A smaller, brown, curly-haired dog is on the right, looking up at the white dog. The background is a soft-focus view of the same mulch.

Retaliation is prohibited

One of the goals of the Code of Conduct is to uphold a safe, fair working environment. For that reason, HERE is committed to maintaining a culture in which our employees feel comfortable raising concerns in good faith about potential violations of the Code of Conduct. Employees who raise a concern that the Code has been breached must not face any repercussions for doing so. Anyone who retaliates against another employee for raising a concern will be subject to strict discipline, up to and including termination of employment.

How to report concerns

Concerns may be reported confidentially to:

- Your line manager
- The HERE Ethics & Compliance Committee: ethicsandcompliance@here.com
- A member of the HERE Legal & IP team
- A member of the employee representative body (if any) for your location
- Our CEO or the Board

If you prefer to raise a concern anonymously, you can do so through the “Report a Code of Conduct Concern” Form, which can be found on the Intranet. You are not required to provide your name or other identifying information, but you should provide sufficient detail so that HERE can investigate fully.

Process

Every concern that is raised will be taken seriously. The Ethics & Compliance Committee will review and promptly address your concern, which may involve assigning a neutral party or auditor to investigate and understand the issue. The team will track your concern from initiation to its resolution to ensure that it receives careful and thorough attention.

If the investigation concludes that the HERE Code of Conduct has been breached, the Ethics & Compliance Committee will decide the appropriate corrective action or discipline. Where appropriate, we will share feedback (respecting confidentiality) with the person who raised the concern and lessons learned with the business.

Corrective action and discipline

An important aspect of upholding the HERE Code of Conduct is taking effective corrective action or employee discipline when necessary. Disciplinary measures, up to and including termination of employment, will be subject to local law. The course of action will depend on a number of factors, including, but not limited to, the following examples:

- **The conduct was intentional or deliberate, or involved a violation of law**
- **The employee cooperated fully and openly with the investigation**
- **The conduct involved dishonesty, theft, fraud or personal gain**
- **The employee has set the right culture for compliance in the organization**
- **The conduct was repetitive or systemic or included efforts to conceal**
- **The employee's level within the organization.**

Before a disciplinary decision is made, the employee under investigation will be given the opportunity to present any additional relevant information that applies to his or her case.

Following the Code of Conduct benefits all of us at HERE by fostering a positive work environment in which ethical behavior comes naturally. Thank you for your support in maintaining our reputation as one of the world's most respected and trusted companies.

