



# TOMTOM ESG REPORT 2021

as included in the  
Annual Report 2021

TOMTOM 

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*\*This ESG Report 2021 is based on the Annual Report 2021 of TomTom N.V. and has been prepared for ease of accessibility. In case of discrepancies between this PDF version and Annual Report 2021, the latter prevails*

# Creating a better world goes beyond our technologies



**At TomTom, corporate responsibility is not an afterthought or about checking a box. We are guided by our desire to create a better world. Our values and vision come through in our products and services, people and communities, and our business operations.**

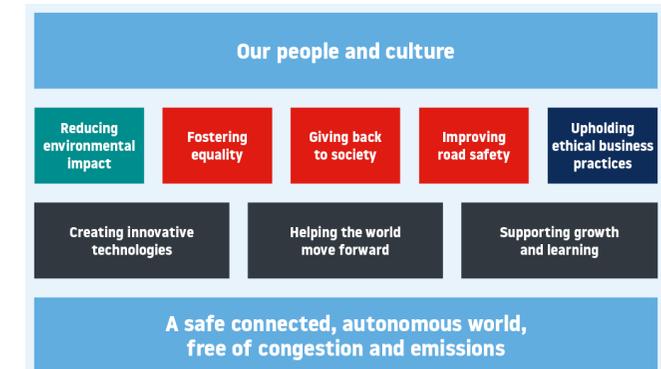
As a global business, we embrace our responsibility to not only minimize our negative impact, but also to maximize the positive one. Our Traffic data helps local governments to manage traffic, businesses to plan smarter working hours and drivers to avoid congested roads, meaning less emissions. We also know that our impact on creating a better world goes beyond our technologies, and we take this responsibility seriously. As a leading location technology expert we strive to not only change the world with our products and services but also to inspire the next generation of tech talent and innovators. Further, we organize initiatives to give back to the communities in which we are present.

**Our ambition is to enable a better world for all through our products and services, our business practices and our community involvement.**

At TomTom we recognize the climate change challenges and are committed to ensuring a sustainable business for our customers and the planet. TomTom's impact on improving road safety and reducing congestion and emissions started many years ago, when we launched the world's first route-planning software for mobile devices. We have since come a long way thanks to the continued innovation of our products and services. Based on our [Environmental Policy](#), we are continually taking steps to reduce our environmental impact through our responsible internal business practices: our Go Green office sustainability programs, practices around materials and energy, waste recycling efforts, and driving a responsible supply chain.

Guided by five central pillars in 2021, which we consider our material topics, TomTom'ers support our drive for a responsible business:

- Reducing environmental impact
- Fostering equality
- Giving back to society
- Improving road safety
- Upholding ethical business practices



Supported by the Management Board and the Supervisory Board, TomTom took many initiatives for enhanced reporting on these pillars in 2021. We made progress in improving our reporting in 2021 and are still in the process of identifying material topics and developing KPIs. We have initiated reporting on Scope 1 and Scope 2 emissions in this Annual Report 2021. With the reporting base set, TomTom will perform a materiality assessment and publish a materiality matrix in the Annual Report 2022 to reassess the material topics and related material risks. All with the aim to move to integrated reporting over time. We will continue improving and expanding our reporting initiatives, included in this section, in 2022.

## INTRODUCTION CONTINUED

**AMBITION**

At TomTom, we are committed to sustainability. With our products and services we help everyone – people, cities, governments and businesses – make smarter decisions, to help save millions of lives globally, eliminate congestion, reduce emissions, and allow us to rebuild cities around people and not just cars.

Since 2020, TomTom integrates the UN Global Compact and its principles as integral parts of our CSR strategy, our culture and our day-to-day operations. Our social commitments are centered around the three Sustainable Development Goals (SDGs) that best align with TomTom's vision as set in 2020 (SDG 4 Quality education, SDG 5 Gender equality, and SDG 11 Sustainable cities and communities). TomTom remains committed to the following SDG targets:

**COMMITMENT SDG's****Target 4.4**

By 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship

**Target 5.5**

Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life

**Target 11.6**

By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management



2021 was a year of continuing development. We strengthened the ESG governance structure by appointing an ESG coordinator and an ESG working group. It was determined that the current SDG social scope needed to be expanded with our environmental footprint. While reviewing the SDG targets and the overall ESG reporting requirements, as indicated above, it was concluded that a more structured materiality assessment was needed in order to set concrete and meaningful key performance indicators (KPIs).

In 2022, we plan to perform a materiality assessment, involving both internal and external stakeholders, and create a materiality matrix which will allow us to set clear and measurable KPIs. In addition, we will continue enhancing our emission reporting, and formalizing our reporting framework for communicating our progress towards our set targets to the Management Board and the Supervisory Board, and to our stakeholders. Having KPIs, underpinned by a broad materiality assessment and a materiality matrix, and adequate data collection practices in place, will further drive us towards a fully integrated ESG strategy.

**EU TAXONOMY**

The EU Taxonomy establishes an EU-wide classification framework intended to provide businesses and investors with a common language to identify, and to report on as of 1 January 2022, to what degree economic activities can be considered environmentally sustainable through the creation of activity specific sustainability criteria. Under the requirements of the EU Taxonomy, companies currently in scope of NFRD need to disclose for reporting period 2021 the proportion of Taxonomy-eligible and Taxonomy non-eligible economic activities in their total turnover, Capital Expenditures (CAPEX) and Operating Expenses (OPEX) including some qualitative information.

In 2021, TomTom has performed an assessment of the applicable EU Taxonomy criteria. Based on this assessment we concluded that our revenue generating activities do not fall under any of the activities described in the Annexes for Climate Change Mitigation and Climate Change Adaptation.

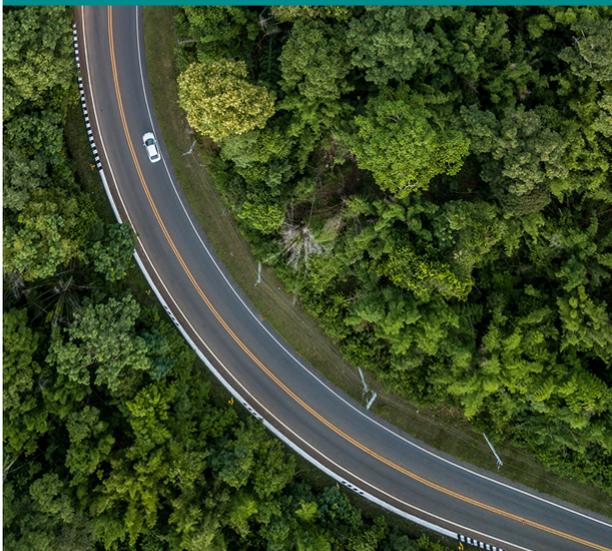
Hence the proportion of revenue that can be considered as eligible is 0% of our total revenue of €507 million. As these definitions are broadly formulated, our assessment is based on our interpretations on how this applies to our business activities and the impact thereof on eligibility. More information on our product offerings and their impact on the environment can be found in the Environmental section on the next page. Disclosures on the nature of our revenue and the accounting policy relating to revenue recognition are provided in note 6 of the financial statements of the Annual Report 2021.

In relation to our efforts to make our offices and facilities more sustainable, activities such as the implementation of energy management systems can be considered as eligible activities for the KPIs Operating Expenses (OPEX) and Capital Expenditures (CAPEX). The proportion of our operating expenses and capital expenditures attributed to these activities are both considered to be less than 1% of respectively our total operating expenses and capital expenditures. Refer note 15 of the financial statements of the Annual Report 2021 for more information on capital expenditures as well as the related accounting policies. Operating expenses per the EU Taxonomy definition covers direct non-capitalized costs that relate to research and development, building renovation measures, short-term lease, maintenance and repair, and any other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment. This differs from the definition of operating expenses in our financial statements.

We will continue to assess our eligibility and the extent of EU Taxonomy alignment in 2022. Future guidance could result in more accurate definitions and other decision-making in meeting reporting obligations that may come into force, which could impact future EU Taxonomy reporting.

# Environmental

By changing the way people move and putting sustainability at the center of what we do, we are making a meaningful contribution to the global community while working hard to limit our own impact on the environment.



## REDUCING ENVIRONMENTAL IMPACT

At TomTom we see climate change as an important environmental risk and feel responsible to reduce our own operational environmental impact. Through our offerings we are enabling everyone – people, cities, governments and businesses – to make smarter decisions and move towards a world with less emissions. While doing so, we are committed to operational sustainability. We adhere to our Environmental Policy and are continually increasing our efforts to identify and minimize our impact on the environment through responsible business practices.

### Technologies to reduce emissions

Interest in electric vehicles (EVs) is soaring, yet their adoption is held back by doubts around practical feasibility. Drivers experience range anxiety, as they are unsure of the vehicle's range and the charging availability along their route. Our products help turn this range anxiety into range accuracy, offering piece of mind to drivers and accelerating the transition towards a cleaner and more sustainable future.

An EV's range depends on much more than its current battery level. Driving speed, traffic, road type and elevation all impact how far a vehicle can go. TomTom EV Routing and Range takes these factors and more into account to plan efficient routes, provide precise range predictions and calculate reliable estimated times of arrival – making every drive enjoyable and effortless. That includes long-distance EV routing that shows drivers where and when to charge on long journeys, as well as how long the stop will take. We also help drivers choose the best time and place for charging, based on availability, charging speed and user preferences.

## Environmental policy

Our Environmental Policy gives guidance to our employees, suppliers, customers, and other relevant stakeholders on how we uphold our environmental standards in everything we do, and helps us keep track of our goals, specific targets and continuous progress.

Our Environmental Policy and associated activities are part of our integrated Quality Management System (QMS), which helps us in our efforts to continuously improve our responsible business practices and supports our vision. Our QMS, which includes our Amsterdam and Eindhoven offices, is compliant with the requirements of the International Organization for Standardization (ISO) 14001:2015 and was re-certified in 2021. The QMS aims to support the business by meeting legal requirements, industry standards, and customer/stakeholder requirements and expectations, helping us minimize our environmental impact. Regular audits are performed by both QMS external auditors, and Group Internal Audit as a control mechanism.



## ENVIRONMENTAL CONTINUED

**Identifying our impact**

Reducing the environmental impact of our operations starts with identifying its sources and adequately reporting on them. During 2021, we have adopted the Greenhouse Gas (GHG) Protocol as the underlying framework driving our GHG emissions reporting. The GHG Protocol was drawn up by the World Resources Institute and the World Business Council for Sustainable Development, and identifies three scopes in which emissions can be categorized.

Scope 1 focuses on direct emissions caused by company facilities and vehicles. For TomTom, Scope 1 emissions originate from heating of our office facilities and company car travel.

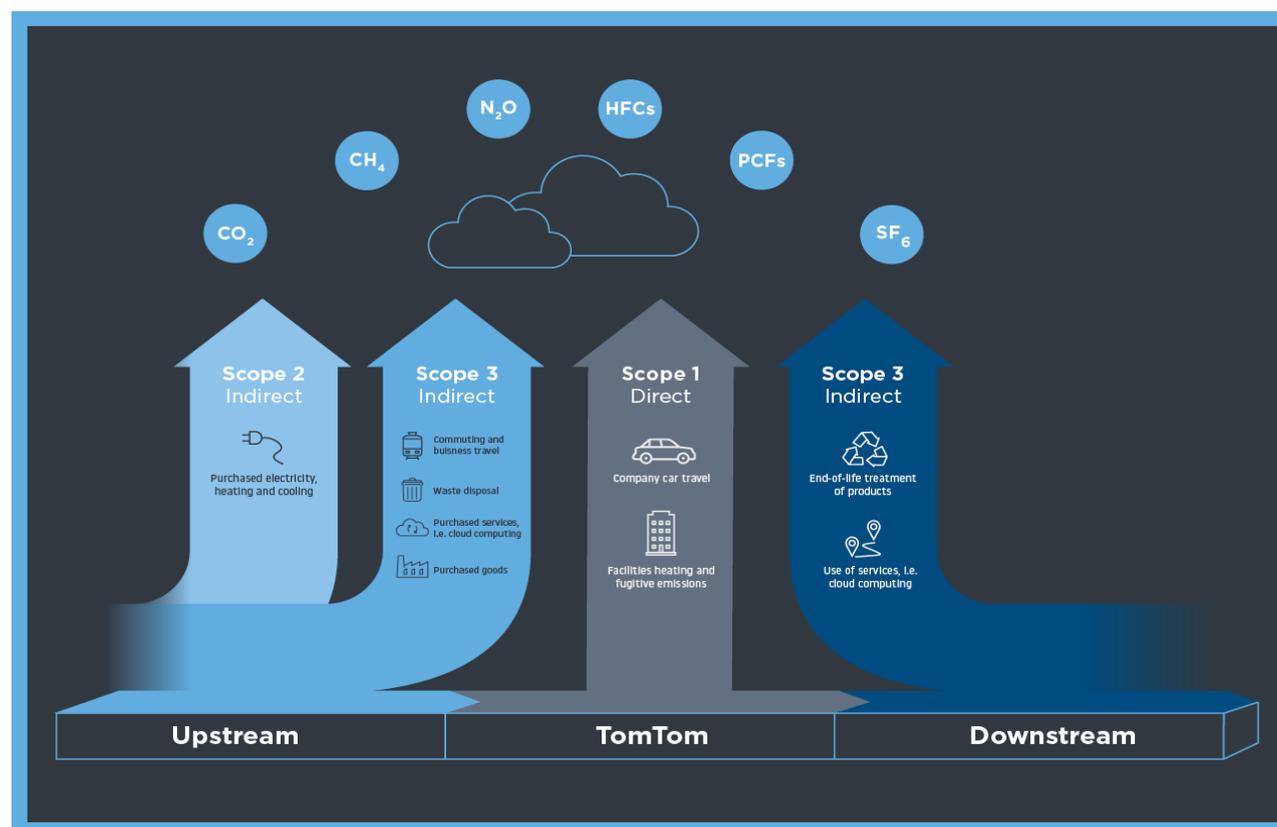
Scope 2 captures indirect emissions resulting from purchased electricity, district heating and cooling.

Lastly, Scope 3 focuses on all other indirect emissions that occur in a company's value chain. Importantly for TomTom, this scope includes emissions from purchased goods, purchased services including cloud computing, waste disposal and employee travel. Additionally, emissions from the end-of-life treatment of products and the use of our services are included here as well.

During 2021, we started reporting initiatives for Scope 1 and Scope 2 emissions. We report on emissions within these scopes from all entities over which we have operational control. Consequently, our reporting includes emissions from owned as well as leased assets.

Though our emissions are not limited to Scope 1 and 2, reporting on these two scopes provides an adequate stepping-stone for more expansive reporting in future years. As regards Scope 3 emissions, it has proven difficult and too preliminary to report on quantitative emission data for 2021. In 2022, we will further assess how we can improve and expand our emissions reporting.

As is the case with our emissions, our sustainability efforts and goals also reach beyond Scope 1 and Scope 2. Important initiatives to reduce emissions within all three scopes and across our operations are discussed as well.



## ENVIRONMENTAL CONTINUED

## SCOPE 1 EMISSIONS

The reported Scope 1 emission figures are computed in accordance with the methods set out in the GHG Protocol. Even though the figures have been carefully computed, limited data availability has led us to use diverging methodologies per emission source.

Under the GHG Protocol, several calculation methods are given. The most accurate reporting is achieved by using the asset-specific method, which considers emissions from individual assets. This method requires detailed consumption data. Should these data not be available, the average-data method allows us to calculate emissions from assets using externally sourced emission factors. Figures for most sources of emissions are computed using a combination of the asset-specific and average-data method, as applicable per asset.

We aim to expand our data collection efforts in 2022, allowing us to increase the accuracy of Scope 1 reporting.

## Facilities

A portion of our Scope 1 emissions originate with fugitive emissions from refrigerant leakages and the use of fossil fuels for heating in our offices. These emissions are estimated using actual consumption data for all of our offices in the Netherlands, our Lebanon, NH (US) office, and a few minor office locations.

For other offices and leased coworking spaces, we compute emissions using the average-data method. We use the most recent available figures from the U.S. Energy Information Administration's (EIA) Commercial Buildings Energy Consumption Survey (CBECS) as our main source of office energy intensity, adapting the figures to account for differing climates across our global footprint. Energy intensity figures are multiplied by floor areas, to arrive at emission estimates.

## Vehicles

Our vehicles also contribute to our Scope 1 emissions. We operate a fleet of leased passenger cars and an array of specialist mobile mapping (MoMa) vehicles.

We have collected consumption data for all vehicles, and report on their emissions for 2021. In addition, we report on comparative figures for 2020 emissions from our lease fleet. MoMa vehicle consumption data over 2020 was not available.

## SCOPE 2 EMISSIONS

Scope 2 includes our indirect emissions from purchased electricity and district heating. These emissions center around our office locations, both owned and leased.

## Facilities

We have actual consumption data for our offices in the Netherlands, Lebanon, NH (US), and some other locations. Due to limited data availability, we used average-data formulas to estimate energy consumption for other offices. Consumption estimates were made using energy intensity figures from EIA's CBECS and floor area data. Though this is in line with the GHG Protocol, we aim to strengthen our data collection in 2022. This will allow for a more accurate representation of our indirect emissions.

Having collected or estimated consumption figures, our emissions from purchased electricity and district heating are computed using grid average emission factors per location.

To accelerate the global energy transition and lower TomTom's corporate carbon footprint we extended renewable electricity certificates for our office locations in Amsterdam, Eindhoven, Ghent, and Lodz in 2021. We included our Lebanon, NH (US), Berlin, and brand-new Hanover office in this strategy, which will be continued in 2022.

Since we employ renewable energy certificates, the GHG Protocol demands us to report on Scope 2 emissions using two methods. Using the market-based method, we take the certificates into consideration. Conversely, the location-based method does not allow for the consideration of contractual instruments, only taking into account consumption data and grid-average emissions.

## SCOPE 1 &amp; 2 EMISSIONS PERFORMANCE

In discussing emissions performance, it should be noted that a greater amount of actual consumption data was available for 2020, where most 2021 figures for Facilities were estimated using emission factors. With that said, Scope 1 emissions, excluding MoMa vehicles, exhibited a year-on-year decrease. Conversely, Scope 2 emissions increased in 2021, which was the result of less extensive office closures and a reactivation of equipment, especially in the APAC region.

## Emissions

(tonnes CO <sub>2</sub> -equivalent)	2021	2020	Method
<b>Scope 1</b>			
Facilities	449	499	Combination
EMEA	340	390	
NAM	94	94	
APAC	15	15	
Lease fleet	575	608	Asset-specific
EMEA	575	608	
MoMa vehicles <sup>1</sup>	1,006		Asset-specific
Scope 1 total	2,030	1,107	Combination
<b>Scope 2 - Market-based</b>			
Facilities	1,844	1,317	Combination
EMEA	644	554	
NAM <sup>2</sup>	65	196	
APAC	1,134	567	
<b>Scope 1 &amp; 2</b>			
Scope 1 total	2,030	1,107	Combination
Scope 2 total	1,844	1,317	Combination
Group total	3,873	2,424	Combination
Per FTE <sup>3</sup>	0.89		
Excl. MoMa vehicles	2,867	2,424	
<b>Scope 2 - Location-based</b>			
Facilities	3,370	2,488	Combination
EMEA	1,954	1,936	
NAM	281	196	
APAC	1,134	567	

<sup>1</sup> Includes global data. No data available on MoMa vehicles in 2020.

<sup>2</sup> Reduction due to introduction of green energy certificates for our Lebanon, NH (US) office.

<sup>3</sup> Metric only reported for 2021, since emissions data for 2020 is incomplete.

## ENVIRONMENTAL CONTINUED

**SCOPE 1 & 2 INITIATIVES**

Scope 1 and Scope 2 emissions center on the environmental impact of our buildings and vehicles. We have launched several initiatives to limit our emissions.

**Sustainable offices**

To limit emissions stemming from our offices, we are actively promoting energy efficiency and working towards green building certifications for a wide range of our locations.

*Energy efficiency*

In 2021 we launched an energy management system to collect and monitor energy and water consumption from 43 data points across 13 office locations. Due to the ongoing COVID-19 pandemic and governmental measures, changes in working conditions under our Working @ TomTom program and technical challenges in tenant spaces, we lowered the priority of our energy initiative. However, further development and automation of this process in 2022 must lead to a complete overview of Scope 2 energy consumption by 2022 across all office locations.

We accomplished becoming more transparent towards stakeholders about the environmental impact of internal operations by displaying the actual performance of our office utilities in three office locations in the Netherlands, representing around 25% of our workforce. The primary energy use of our offices in the Netherlands was impacted by fluctuating office occupancy during the COVID-19 pandemic.

**Primary energy use**

(GJ/m <sup>2</sup> )	2021	2020
Netherlands	0.78	0.88

*Green building certifications*

TomTom conducts green building assessments in various global office locations. Internationally recognized assessment and certification schemes such as BREEAM (Building Research Establishment Environmental Assessment Method) and LEED (Leadership in Energy and Environmental Design) are being used to adopt best practices and accomplish sustainable development goals. Topics addressed in these assessments are climate change, human health, water efficiency, biodiversity, and material use.

Following the successful BREEAM-NL certification for our headquarters office in Amsterdam (Amsterdam DRK) in 2020, our newly built Belgrade office was LEED BD+C (Gold) certified in February 2021. Our headquarters office in Amsterdam and our Eindhoven office became BREEAM In Use (Very Good) certified in December 2021. In addition, we strived to have our other office in Amsterdam (Amsterdam ODE) and Ghent offices BREEAM In Use (Very Good) certified in 2021. However, due to challenges in the timely completion of the pre-assessment, these certifications are postponed to the first quarter of 2022. The re-certification of our Ghent office is managed by the landlord to create impact on a larger scale with the ambition to get the complete building certified ranking BREEAM Very Good by 2023.

Our Amsterdam and Eindhoven offices operated carbon emission neutral in 2021 as a result of purchasing certified wind energy, the use of geothermal heating and cooling, and refrigerant management.

In 2022 we will continue with these sustainable office initiatives, replicating them in other strategic locations. We aim to have our brand-new Pune office and our Belgrade office LEED ID+C (Gold) certified. These certifications allow us to enhance internal sustainability performance and lower our Scope 1 and Scope 2 emissions accordingly.

**Efficient vehicles**

As mentioned above, we are focusing on improving the efficiency of our buildings, an objective that also extends to our vehicle fleet.

For this reason, in August 2021, TomTom released its new Company Car Policy in Belgium which will be further extended to all European countries in 2022. This policy paves the way for the electrification of our fleet. The intent is to provide full electric or plugin hybrid lease cars by default.

**SCOPE 3 INITIATIVES**

Our emissions reporting is limited to Scope 1 and Scope 2 emissions, though our efforts also touch on Scope 3 emissions. We are driving a responsible supply chain, carefully managing our resources and promoting efficient operations.

**Driving a responsible supply chain**

We maintain a high level of social responsibility towards our customers and suppliers. In 2021, we stepped down as a member of the Responsible Business Alliance (RBA). We established our own TomTom Supplier Code of Conduct (SCoC) that sets out our expectations towards our business partners. As a result, any existing or new suppliers who have been provided with this SCoC must sign it and confirm their full compliance. Suppliers are also asked to acknowledge our Environmental Policy, to support our plans and efforts to reduce the environmental footprint of our business activities, and to improve social, environmental and ethical practices.

*Cloud hosting and data centers*

High-quality, comprehensive location data is key to building the next generation of location-based applications. Dealing with big data to develop our products and services requires advanced, scalable, state-of-the-art technology, including secure, scalable data storage and hosting.

Our activities result in emissions from using either on-premise data centers or our use of cloud storage providers. In recent years, we have moved the majority of our activities to outsourced cloud-hosted storage such as Amazon Web Services and Microsoft Azure, which helps us manage these services and their impact more efficiently. In 2022, we will focus on working together with our suppliers on emissions reporting.

*Manufacturing*

Outsourcing is an important element of our Consumer business model. The assembly of our Consumer navigation devices, accessories and (reverse) logistics is entirely outsourced. It is of great importance that our suppliers recognize and observe fundamental human rights, safety and the environment in their operations. As part of our Corporate Environmental Product Compliance program, we proactively monitor the legislative and regulatory developments that apply to our products, accessories and packaging in order to establish our corporate and supplier requirements. Environmental legislation on chemical substances is continually evolving; therefore we consistently monitor, evaluate and communicate these changes with our business partners to ensure we are current and compliant.

## ENVIRONMENTAL CONTINUED

**Management of resources, efficiency and consumption**

We have undertaken several initiatives to monitor and manage our consumption of resources in our offices.

*Water*

We have implemented tooling to monitor water usage in the Netherlands, covering around 25% of our workforce. The impact of low office occupancy during COVID-19 restrictions in the Netherlands, is visible in the office water usage per FTE. Prior to the COVID-19 pandemic, the national average water consumption in the Netherlands in office buildings was 7.1 m<sup>3</sup>/FTE.

<b>Water use</b>	<b>2021</b>	<b>2020</b>
(m <sup>3</sup> /FTE)		
Netherlands	2.92	2.71

In 2021 we started water usage reporting initiatives for our offices in Lodz, Ghent, Pune and Taipei, which will create a baseline for further opportunities for improvement in 2022.

*Resources*

Whenever available we strive to use Forest Stewardship Council (FSC) certified products in cooperation with licensed suppliers. In previous years, we already selected FSC certified catering and sanitation products (e.g. coffee cups, toilet paper) by default. Now all frequently used furniture suppliers and construction contractors signed our letter of compliance and we continue to include responsible sourcing of timber products in new tenders. One highly valued furniture supplier took the effort to become licensed and together we are committed to continue our efforts against unsustainable deforestation. In 2021 we worked together with our stationary supplier to assess our standard range of products and selected 32 preferred sustainable alternatives based on their recycled and eco-friendly contents.

**Waste management and recycling**

TomTom is committed to a proactive global take-back strategy since we started our global waste recycling program in 2019. Our strategy spans waste generated at both our facilities and within our supply chain.

*Facilities*

We have implemented recycling in all TomTom offices worldwide, focused on increasing recycled waste and reducing general waste. The program entails separating waste at the source, making sure each waste type is processed properly by our suppliers, ensuring that waste recycling takes place within the country, and specified raw materials are to be created out of our office waste.

Our new way of working affects the quantities of material demand and office waste. This can be seen in the footprints of our offices and, for example, in waste statistics for the Netherlands. The changes to our way of working, caused by the COVID-19 pandemic, led us to execute major clean-ups of our storage rooms and archives in 2021. We disposed 96 two-sit desks to be reused by resellers and charities. This contributed significantly to waste volume and led to a decrease in the percentage of waste recycled, while increasing the percentage of waste that was reused.

**Office waste**

(% of waste in the Netherlands)	<b>2021</b>	<b>2020</b>
Reused	39%	0%
Recycled	29%	55%
Composted	11%	8%
Energy recovery	21%	37%
Landfill	0%	0%
Total (in kg)	33,239	31,218

We continue to move away from environmentally less preferable disposal methods like energy recovery and landfills. With more TomTom's returning to our offices, we aim to improve the ratio of composted, recycled and reused waste by creating awareness and sharing educative communication materials about separation at the source in 2022.

*Supply chain*

Because of our ongoing shift towards providing more data, content and services and declining PND sales, we expect to produce less waste in our supply chain over the coming years, resulting in a smaller environmental footprint. This is also reflected in the amount of associated waste recycled, which is decreasing.

**Recycled waste**

(Tons, unless stated otherwise)	<b>2021</b>	<b>2020<sup>1</sup></b>
Electrical and electronic equipment (WEEE)	197	225
Battery waste	13	14
Packaging waste <sup>2</sup>	211	232

<sup>1</sup> Data deviates from reported numbers in Corporate Responsibility Report 2020.

<sup>2</sup> Excludes data from the USA, Australia and New Zealand.

We remain committed to recycling and a responsible end-of-life treatment of our sold products.

**Traveling**

Sustainability is a top priority for TomTom's Travel Program in 2022. When booking travel, travelers will be encouraged to replace short-haul flights for trains, and the preferred hotels will be carefully selected based on their sustainability program.



## SOCIAL CONTINUED

**Women in engineering and leadership positions**

We believe diversity makes TomTom stronger as a company. Our people have a wide variety of backgrounds. There are people with disabilities, people from the LGBTQIA+ community, people of color, and more. We take effort to include everyone and strive for diversity, on our journey to delight our customers together and become a better, stronger company.

As a direct result of setting the targets and objective to reach 34% female representation by 2024, TomTom hired more women in 2021. Women accounted for 24% of new hires in 2021 compared to 19% in 2020.

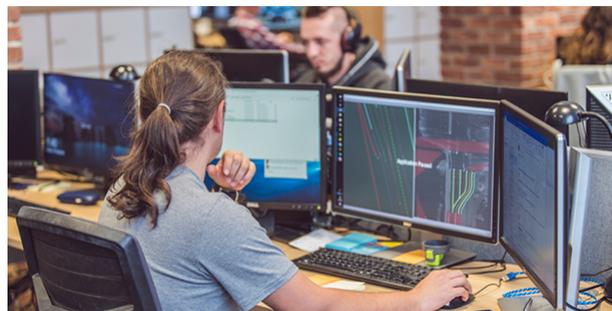
Looking specifically at engineering and leadership, female engineering hires increased from 9% to 16% in 2021 and women accounted for 25% of hires in director and above positions. As our workforce is increasingly composed of highly technical roles, we acknowledge the complexities involved in reaching gender equality targets. Despite impressive increases in female hiring, our female representation has stayed steady at 28% for the fourth year in a row.



Currently, we have no women in the Management Board. TomTom believes in the strength of diversity and will, when a vacancy in the Management Board arises, consider all diversity aspects, including gender diversity. The diversity policy of the Management Board is further included in the Management Board section of the Annual Report 2021.

Considering the expiration of the second term of Jacqueline Tammenoms Bakker at the AGM 2022 and to secure a proper succession planning, the Supervisory Board decided on the temporary need for a sixth Supervisory Board member. With the appointment of Karien van Gennip in October 2021, the composition of the Supervisory Board was 50% female and 50% male (2020: 40% female and 60% male) at 31 December 2021. However, she was required to step down from the Supervisory Board due to her appointment as Minister of Social Affairs and Employment in the Dutch government on 10 January 2022, which could not be combined with her duties at TomTom. The diversity policy of the Supervisory Board is further included in the Supervisory Board section of the Annual Report 2021.

Diversity and inclusion continue to be important to us, and while we are proud of what we have achieved in 2021, we look forward to increasing representation throughout the organization, we will continue the best practices we have adopted in hiring and turn inward, focusing on growth, development, and retention of all TomTom'ers, finding new ways of encouraging growth within our community and empowering TomTom'ers to be themselves.

**GIVING BACK TO SOCIETY**

We know that our impact on creating a better world goes beyond our technologies and we take this responsibility seriously.

In 2021 many countries were still fiercely battling COVID-19, including India. Maharashtra, the region where TomTom's largest office site is located, was especially impacted as growing cases pushed its healthcare system to the brink.

TomTom'ers globally united to raise EUR 45,000 to donate towards the relief efforts in the region. Funds raised were used to provide oxygen, hospital beds, ventilators and access to intensive care units and more to the area immediately surrounding our Pune office.

In both Harsum and Eindhoven in the Netherlands, we donated office furniture to be reused by a local charity, a primary school, a day care center and nursing homes.

**Codam Coding College mentoring program**

We continued working closely with Codam, a tuition-free coding college that develops tech-based skills, founded by Corinne Vigreux. This year, experienced TomTom'ers took Codam students under their wing during a three-month mentorship program, helping prepare students for their careers by bridging the gap between their personal goals and skills and job market.

**TomTom n.EXT Global Student Hackathon**

Guided by TomTom mentors, 75 students from top tech universities across the world came together to participate in our first global student hackathon. During the virtual event, students tackled real-life challenges from TomTom as they competed for world-class prizes and the opportunity to present their award-winning idea at What the Hack, TomTom's annual internal hackathon.

## SOCIAL CONTINUED

**IMPROVING ROAD SAFETY**

We are committed to investing in technologies that make roads safer for all. Road crashes take a huge toll on individuals, families and nations, claiming the lives of more than 3,000 people each day. We are creating technologies that make driving safer, such as:

- Embedded navigation, consisting of SD/HD maps and navigation software that enhances driver concentration on the road ahead
- ADAS map features for more advanced automated vehicle safety features (speed limits, tail gate warnings, automatic braking and gear shifting)
- Navigation and routing provide accurate route guidance and estimated times of arrival, enabling drivers to get where they are going on time with less stress
- Traffic information services provide early warnings about traffic incidents such as upcoming jams, helping drivers slow down gradually rather than needing to brake sharply.

**A safer world**

Speed limits is key to road safety, as speeding has been one of the leading factors in road deaths since the invention of the car. To make driving safer, EU legislation made Intelligent Speed Assistance (ISA) mandatory for all new vehicle types starting in 2022, and mandatory for all new cars per 2024. ISA is a vehicle safety feature that informs drivers when they have exceeded the speed limit. The technology is estimated to reduce accidents by 30% and deaths by 20%. Traffic sign recognition and intelligent speed control fuse camera input and compare this with TomTom ADAS Map data. Using GPS positioning, the relevant speed limit is extracted from the map. The map data is then made available via proprietary TomTom software, called Virtual Horizon.

For more information, have a look at this [blog post](#) and visit our [website](#).

**Safer roads**

The United Nations General Assembly has set an ambitious target of halving the global number of deaths and injuries from road traffic crashes by 2030. To meet this goal, UN Member States have agreed on 12 global targets for road safety, which include ensuring all new roads are built to a three-star or better standard (or achieve technical standards for all road users that take into account road safety). By determining the star rating of roads in their network, road authorities know where to take tangible steps to improve both the quality and safety of roads. Through its Mobile-Mapping vehicles, TomTom provides high-quality, globally consistent map data and services to support Interactive Risk Attributable Program modeling – making it easier for road authorities or customers to evaluate and improve the safety of their network.

More information is provided in this [blog post](#).

**TomTom Traffic Index**

Created to help cities around the world combat severe mobility challenges, the TomTom Traffic Index provides free access to live and historical traffic data. The TomTom Traffic Index has been providing drivers, city planners, auto manufacturers and policy makers with statistics, information and detailed insights on traffic congestion levels in hundreds of cities across 57 countries on six continents for over 10 years. The report ranks cities from the most to the least congested.

In 2021 the tenth edition of the Index gave even more insights into congestion, how the global pandemic impacted the world's movement, and how to tackle traffic-related urban mobility challenges.

**Traffic data and COVID-19**

The pandemic dramatically changed the way we live, work and move. Lockdowns, remote working and other restrictions have transformed patterns of movement and reduced traffic congestion in most cities.

TomTom's traffic data provides a barometer of people's movement, trade, and economic activity. Our traffic insights continue being used by analysts, corporations and the media to explain a world in flux due to the pandemic.

# Governance

At TomTom we're committed to conducting business responsibly, while aiming to generate the most impact for all our stakeholders. Our governance structure supports our commitment, through long-term value creation, ethical business practices, and a values-driven culture.



## ETHICAL BUSINESS PRACTICES

TomTom is committed to conducting business in a transparent, ethical and accountable manner. Our ethical business practices reflect our commitment to transparency and accountability, allowing us to build a relationship of trust with our stakeholders. As a data-driven company, these practices include an unwavering commitment to personal data privacy and a high degree of transparency across our actions.

### Code of Conduct

Our Code of Conduct describes our business principles, guiding our employees both inside the company and in their interactions with external stakeholders.

Our Code of Conduct training and awareness program and control mechanisms play a pivotal role in preventing bribery and corruption and other misconduct at TomTom. The program is designed to permanently instill an awareness of everyone's responsibility to uphold TomTom's business principles and to speak up in case of any misconduct. The program includes online gamified training, virtual localized and interactive refresher sessions, tailored communication and custom-made campaigns on specific topics like human rights, safe working environments, anti-bribery and corruption, security and confidential information and our [Open Ears Procedure](#). Our business principles and corporate policies and procedures are an integral and mandatory part of our global induction program for all employees. No Anti-Bribery KPIs were set for 2021.

Our labor principles outline our commitment to human rights and include, among others, freely chosen employment, respect for age requirements, non-discrimination and freedom of association. The principles are reflected in the way we treat our employees and are included in our policies, employment agreements and recruitment procedures.

We also published a [Slavery and Human Trafficking Statement](#) under the UK Modern Slavery Act that summarizes our actions to address the risk of modern slavery within our own operations and those of our suppliers. No Human Rights KPIs were set for 2021.

In our effort to improve our practices continuously, also as part of our Quality Management System, we will further develop and articulate our policies, risk management processes and KPIs in relation to matters such as our environmental impact, human rights and anti-corruption and bribery.

Our employees and external stakeholders are provided the opportunity to (anonymously) speak up about any (potential) misconduct without the fear of retaliation. We received 9 reports through our Open Ears Procedure in 2021. The reports related to claims of breaches of internal procedures, fraudulent activities, harassment, discrimination and bullying. All reports were duly investigated and all cases which we could substantiate were followed up on in accordance with the company's policy.

### Tax principles

TomTom's contribution to society includes the payment of taxes. The taxes we pay help fund public services provided by governmental institutions in the countries where we operate. Our approach to tax is formulated and published on our corporate governance website.

The following table provides an overview of our net payments of corporate income tax:

(€ in thousands)	2021	2020
Europe	6,171	6,136
North America	475	669
Rest of World	923	1,208
	<b>7,569</b>	<b>8,013</b>

As shown in the table above, taxation is an integral part of our business and is paid in the regions where we operate.

### Data privacy

We are a data-driven company that separates itself from the competition through strict data privacy governance and practices. The data we collect is solely used to improve our technology, and not to feed alternative business models. See the next page on Data Privacy and Security for more information.

# Data privacy and security are built into our products, services and business model

Security has always been a priority at TomTom. We focus on giving everyone the right to personal privacy when using our technology. To this end, we follow a privacy and security-by-design approach to ensure the full life cycle of our products and services is designed to enable user privacy, with security and control over their personal data. With this approach, we consider data privacy, security, and the proper management of data from the start of design through the entire engineering and operations process.

Our Information Security Management System (ISMS) ensures that we meet the security demands of our customers in a standardized and holistic manner. Our security capabilities protect the privacy of our customers and our products.

Data drives our business, but data privacy comes first. That means we use big data to drive continued innovation and product improvements, processing billions of anonymous ('de-identified') global data points every day. People using products and services based on our technology contribute to a continuous feedback loop that we use to improve our technology for users. We do not use any data for advertising purposes.

We apply the EU General Data Protection Regulation (GDPR) on a global scale. GDPR is considered to be the most extensive privacy regulation in the world. It supports us in offering a high level of protection to our users worldwide by allowing us to use their data only when strict regulations are met.

## TOMTOM PRIVACY PRINCIPLES

### Protecting personal identity

We embed aggregated location data in our products, protecting individual details.

### User control

We enable people to remain in control of their data. At any time, people can opt-out or opt-in when using our technologies.

### We never sell personal data

We only use personal data to improve our technology.

### No ads

We design our products to guide people, with no intrusive or distracting ads.

## TOMTOM SECURITY PRINCIPLES

### Security mindset

We put security at the heart of everything we do. Security is part of everybody's daily work, ensuring safe and secure products for our customers and a safe and secure working environment within TomTom.

### Security by design

We embrace doing the right things and doing things right from the start – whatever TomTom builds, buys, or does. We do risk-based protection of information together with our customers.

### Transparency

We promise to be the responsible and trusted custodians of our customers' data. We will be transparent if our customers' data or products are ever at risk, and proactively inform and involve customers as early as possible to minimize any potential adverse impacts.

## FOR MORE INFORMATION

How we use our customers' data:

[tomtom.com/company/privacy/](https://tomtom.com/company/privacy/)

CONTINUED



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