

GARMIN.

UK MODERN SLAVERY ACT 2015 STATEMENT

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GARMIN (EUROPE) LTD.



This Statement has been prepared pursuant to the requirements of the Modern Slavery Act 2015 (the "Act") for the fiscal year ended 30 December 2023 for Garmin (Europe) Ltd. (the "Company", "Garmin Europe", "we", or "our").

OUR STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Garmin Europe is incorporated and domiciled in the United Kingdom. Garmin Europe's ultimate parent is Garmin Ltd., a company registered in Switzerland. The Company's principal business activities are importation, distribution, marketing and sale of navigation, communication, and information devices, applications, and services, many of which feature location technology such as the Global Positioning System. As of 30 December 2023, Garmin Europe had more than 375 employees.

The majority of the products the Company sells are supplied from Garmin Corporation, a Taiwanese company, and other subsidiaries of Garmin Ltd. (collectively, the "Garmin Group" or the "Garmin"). Garmin-owned manufacturing operations are located in Taiwan, People's Republic of China, the United States, Poland and the Netherlands.

Garmin purchases components from third-party suppliers from around the globe.

RISKS OF SLAVERY AND HUMAN TRAFFICKING IN OUR BUSINESS AND SUPPLY CHAINS

Human rights observers have identified the potential for modern slavery in the production of electronic products and in the production of components of electronic products. Because Garmin employees manufacture the vast majority of Garmin products, the Company believes there is a very low risk of slavery and human trafficking in the production of Garmin products.

All individuals employed by the Garmin Group are subject to Garmin's [Code of Conduct](#) and [Modern Slavery Policy](#). These documents and policies set forth Garmin's position related to human rights issues and are enforceable at all levels of the organization.

Among other clauses, Garmin's Code of Conduct:

- explicitly condemns and prohibits any act of human trafficking or modern slavery, which includes forced labour and child labour, within Garmin's own operations and throughout Garmin's supply chain; and
- establishes Garmin's policy on respecting all employees' rights to freedom of association and freedom of movement.

With respect to the production of components of Garmin's products, Garmin (including the Company) mitigates the risk of slavery and human trafficking by requiring upstream suppliers to comply with Garmin's [Supplier Code of Conduct](#), which sets forth expectations on human rights and labour practices of suppliers.



Among other requirements, Garmin's Supplier Code of Conduct:

- prohibits use of child labour, involuntary, forced, prison, indentured or slave labour, human trafficking or the hiring of trafficking and debt bondage victims;
- requires that upstream suppliers guarantee employees freedom of movement and freedom of association; and
- mandates that upstream suppliers conduct due diligence to identify and prevent forced labour and human trafficking within their own supply chains.

Instances of noncompliance are subject to action, which may include termination of relationship with the upstream supplier.

MEASURES TAKEN TO ASSESS AND ADDRESS RISKS OF SLAVERY AND HUMAN TRAFFICKING, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES



Garmin Europe follows the Garmin [Code of Conduct](#) and [Modern Slavery Policy](#). These principles and policies are established and enforced on a global scale and are reviewed on a regular basis by the highest levels of the organization. All Garmin employees must read and acknowledge the Code of Conduct annually. The Code of Conduct includes policies covering human rights, freedom of association, and freedom of movement. We are committed to educating our workforce about modern slavery and human trafficking and ensuring compliance with applicable laws. Garmin's whistleblower policy also provides confidentiality and protection to any individuals who raise concerns.

Upstream suppliers to Garmin are required to follow the Garmin [Supplier Code of Conduct](#). Additionally, Garmin's standard supply agreements require suppliers to assure us that products they supply are not produced, manufactured or packaged by forced, prison or child labour. Garmin conducts periodic assessments of our suppliers to assess and verify compliance with Garmin's Supplier Code of Conduct and other supply chain requirements. These assessments include evaluations of compliance with policies implemented to prevent slavery, human trafficking, and other human rights issues. If any form of slavery or human trafficking is discovered in Garmin's own operations or in Garmin's supply chain, corrective action and remediation is performed.

Based on our assessment of our activities and supply chain, there were no instances of modern slavery or human trafficking found within or reported to the Company in the fiscal year ended 30 December 2023.

ASSESSING THE EFFECTIVENESS OF THESE MEASURES



The Company has confidence that controls and processes are in place to ensure compliance with Garmin's global policies relating to slavery and human trafficking. Garmin conducts a top-down governance model on corporate responsibility matters, including those pertaining to slavery and human trafficking, and evaluates the effectiveness of actions on a regular basis and implements remediation plans when necessary.



BOARD OF DIRECTORS APPROVAL AND ATTESTATION



This Statement was approved in accordance with the UK Modern Slavery Act 2015 by the Board of Directors of Garmin (Europe) Ltd. on 24 June 2024.

Sean Biddlecombe
Managing Director, EMEA
Garmin (Europe) Ltd.
24 June 2024