

Webfleet Solutions Sales B.V.

Modern Slavery Act Statement 2020

This statement is made pursuant to Section 54 of the United Kingdom Modern Slavery Act 2015 and outlines the steps that Webfleet Solutions Sales B.V., which conducts its business activities in the UK through a branch office, has taken and is continuing to take to ensure that modern slavery and human trafficking are not taking place within our business or supply chains. The statement relates to the financial year ending on 31 December 2020.

OUR BUSINESS AND ORGANISATIONAL STRUCTURE

Webfleet Solutions is Europe's leading provider of fleet management, vehicle tracking solutions and connected car services. Its main Software-as-a-Service solution WEBFLEET is used by businesses of all sizes to improve vehicle performance, save fuel, support drivers and increase overall fleet efficiency.

Webfleet Solutions has over 50,000 customers worldwide and services drivers in more than 100 countries, providing them with the industry's strongest local support network and widest range of sector-specific third-party applications and integrations.

Webfleet Solutions Sales B.V. is a wholly owned subsidiary of Webfleet Solutions B.V., based in the Netherlands. In April 2019, Webfleet Solutions B.V. (formerly known as TomTom Telematics B.V.) and all its subsidiaries were acquired by Bridgestone Europe NV/SA, subsidiary within the Bridgestone Corporation group of companies ("Bridgestone"), the world's largest manufacturer of tyres and rubber products. In addition to tyres for use in a wide variety of applications, it also manufactures a broad range of diversified products, which include industrial rubber and chemical products and sporting goods. Its products are sold in over 150 nations and territories around the world.

OUR POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Webfleet Solutions, being an integral part of Bridgestone, abides by and acts in accordance with Bridgestone's values, mission and policies. At Webfleet Solutions, we operate under the strong standards regarding our employees, the environment, clients we serve and all other stakeholders.

Webfleet Solutions, as part of Bridgestone, has a zero-tolerance approach to any form of modern slavery and is committed to acting ethically and with integrity and transparency in all business dealings. We are committed to conducting business in accordance with the values embodied in the Bridgestone Code of Conduct and other relevant policies and statements. These include:

- **The Bridgestone Group Global Human Rights Policy**

Bridgestone's Group Global Human Rights Policy reflects human rights principles that Bridgestone expects every business, subsidiary, leader, employee, vendor and supplier to uphold across the world and confirms Bridgestone's commitment to advancing fundamental human rights and responsible labour practices within the Group, and among its subsidiaries. This Policy affirms the Group's

- Respect for diversity and inclusion
- Prohibition of discrimination and harassment
- Focus on workplace safety and health
- Commitment to responsible labour practices
- Prohibition of forced/compulsory labour
- Protection of free speech and association.

Suppliers and vendors are also expected to uphold this policy.

The Bridgestone Group Global Human Rights Policy can be accessed here:

https://www.bridgestone.com/responsibilities/human_rights/

- **The Bridgestone Code of Conduct**

Bridgestone's Code of Conduct sets forth the manner in which the Bridgestone Group functions and how employees, subsidiaries and suppliers are expected to act.

Code of Conduct Guidelines we abide by requires that Bridgestone, its group companies, including Webfleet Solutions and employees do not discriminate against other employees; differences in opportunities and/or treatment must be based only on elements relating to an employee's ability, competence, and achievement. Discrimination on the basis of race, ethnicity, nationality, birthplace, colour, age, gender, sexual orientation, disability, religion, political affiliation, union membership, marital status or any other characteristic that may be protected by law is not allowed.

The Bridgestone Code of Conduct can be accessed here:

<https://www.bridgestone.com/responsibilities/code/index.html>

- **Respect, dignity and diversity**

Webfleet Solutions promote respect, dignity and diversity. Bridgestone's Code of Conduct sets out requirement for employees of Bridgestone and its group companies, including Webfleet Solutions, to be tolerant and not to discriminate against other employees; differences in opportunities and/or treatment must be based only on elements relating to an employee's ability, competence, and achievement. It is not allowed to discriminate on the basis of race, ethnicity, nationality, birthplace, colour, age, gender, sexual orientation, disability, religion, political affiliation, union membership, marital status or any other characteristic that may be protected by law.

- **Recruitment policy**

There is a robust recruitment policy, including checks of all prospective employees on their eligibility to work in the United Kingdom, to safeguard against human trafficking or individuals being forced to work against their will.

DUE DILIGENCE

Webfleet Solutions is committed to ensuring that we and our suppliers comply with all applicable laws, regulations, and employment standards. We believe in doing our part to abolish the unacceptable practices of child labour and forced or compulsory labour throughout the world. We prohibit child and forced/compulsory labour in our organisation and in our supply chain. Our goal is to provide quality job opportunities for residents of our local communities, with reasonable working hours, clean and safe working conditions, and fair, market-competitive pay and benefits.

Webfleet Solutions' suppliers are made aware of our and Bridgestone's policies and are required to comply with the Bridgestone Code of Conduct. The Bridgestone Group and Webfleet Solutions, as part of the Bridgestone Group, adhere to Global Sustainable Procurement Policy, which establishes a number of requirements applicable to our suppliers and confirms our and our suppliers' commitment to transparency, compliance, supporting of fair labour practices and sustainable procurement practices. When selecting and managing qualified suppliers, we verify that these suppliers comply with law and operate consistently with our commitment to compliance and ethics.

RISK ASSESSMENT AND MANAGEMENT

We require our suppliers to comply with all laws and regulations regarding human rights in their country and/or region of operation and to use their best efforts to have full knowledge of the source of the products and services they supply to enhance the traceability of products and services, and to identify potential human rights impacts.

Furthermore, we encourage suppliers to:

- develop training and enhance their employees' knowledge on human rights and other social issues;
- work towards complying with international standards and best practices regarding human rights, working conditions, or other related issues;
- support their upstream supply chain to learn about and comply with international standards and best practices regarding human rights, working conditions, or other related issues; and
- verify that they and their upstream supply chain operate in compliance with international standards and best practices relative to human rights, working conditions, or other related issues.

Webfleet Solutions reserves the right to monitor suppliers by means of carrying out supplier factory audits and has performed a number of audits in the past to ensure that suppliers are adhering to fundamental human rights when carrying out their business activities. We conduct quarterly meetings with our key suppliers where a performance review is conducted and supplier's compliance with responsible labour practices and its business integrity is being assessed. Webfleet Solutions reserves the right to visit supplier's production plants to monitor employee's working conditions and has done so in the past. Webfleet Solutions continues to use reputable suppliers and manufacturers to ensure that risks of modern slavery and human trafficking are minimised through the support of robust processes within the supply chain. We are satisfied that because of the nature of our business and supply chain the steps taken to date are in line with the identified risks of modern slavery and human trafficking.

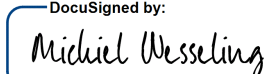
TRAINING AND AWARENESS

In order to raise employee awareness, all Webfleet Solutions employees are required to undertake an annual training on the Bridgestone Code of Conduct. Completion levels are monitored to ensure that the training is successfully finished within the necessary timelines.

Next to this, Bridgestone operates whistleblowing hotlines through which all employees of all Bridgestone's subsidiaries may raise concerns about legal or policy violations or concerns, e.g. about suspected practices within our business or supply chain, without fear of retaliation.

Webfleet Solutions is committed to continuously improving on its commitments by furthering cross functional collaboration between legal, HR and other departments and enhancing focus of staff and supplier awareness throughout the year of the importance of whistleblowing and how to identify human trafficking and slavery.

This statement has been approved by the board of directors of Webfleet Solutions Sales B.V.

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Michiel Wesseling, COO
Date: