Nearmap



MODERN SLAVERY STATEMENT





INTRODUCTION

This is Nearmap's Modern Slavery Statement ("Statement") and covers the period of 1 July 2023 to 30 June 2024 ("FY 24 Reporting Period").

This Statement is provided by Atlas AU HoldCo Pty Ltd (ABN 25 661 797 904) ("Atlas"), being the holding company of the Nearmap group of entities in Australia and applies to Nearmap subsidiary entities which includes Nearmap Australia Pty Ltd (ABN 16 120 677 250) (together, "Nearmap", "we", "us" or "our"). Nearmap has subsidiaries across Australia and the United States.

The Statement has been prepared in accordance with Australia's *Modern Slavery Act 2018* (Cth) (the "**Act**") and Nearmap's Global Modern Slavery Policy. It outlines the steps Nearmap has taken to identify and address the risks of modern slavery (as defined in the Act) in its supply chain and business operations in the FY24 Reporting Period.

OUR BUSINESS, STRUCTURE & OPERTATIONS

Nearmap is a leader in high-resolution aerial imagery and location intelligence solutions delivered through a software-as-a-service model. With the use of proprietary camera systems, advanced imagery capture techniques and Al-driven insights, Nearmap empowers businesses and government organisations to leverage geographic insights, facilitate improved planning, analysis and decision-making across key sectors including insurance, urban planning, architecture, construction and utilities.

Nearmap is headquartered in Sydney, Australia and operates globally to provide services across Australia, the United States of America ("**US**"), Canada and New Zealand. Our US offices are in Salt Lake City (Utah) and Arlington (Virginia). For the FY24 Reporting Period, Nearmap employed approximately 400 staff across Australia and the United States.

OUR POSITION ON MODERN SLAVERY

Nearmap is committed to preventing modern slavery within its operations and supply chain. We recognise the importance of respecting human rights and are dedicated to fostering a workplace and business environment that is safe, ethical and trusted. We believe that these core values are paramount to ensuring that Nearmap is a business where people want to work and that our customers want to be associated with. These core values are the pillars of Nearmap's commitment to ensuring that we reject all forms of modern slavery such as servitude, human trafficking, forced labour and marriage, child labour and debt bondage. Our commitment is reflected in the measures we have implemented and maintained to identify and manage human rights risks across our business. This is further reinforced through the oversight of our supply chain as set out in our Global Modern Slavery Policy.

GOVERNANCE FRAMEWORK

The Corporate Code of Conduct outlines the ethical standards expected of all our directors, employees, contractors, subcontractors, consultants and any individual performing work for Nearmap. Nearmap is committed to maintaining ethical standards in how we conduct our business activities and manage stakeholder relationships. The Corporate Code of Conduct is supplemented with additional policies that forms part of a broader business conduct framework which includes policies such as the Global Modern Slavery Policy, Global Anti-bribery and Corruption Policy, Global Whistleblower Policy, Diversity & Inclusion Policy and the Health, Safety & Environment Policy. Nearmap recognises that a strong governance framework must be maintained and reviewed on a regular basis. Accordingly, Nearmap's Audit and Risk Management Committee and the People, Culture and Remuneration Committee maintain oversight over Nearmap's adherence to the policies and governance framework accountability.





IDENTIFYING MODERN SLAVERY RISKS

Nearmap has maintained its risk assessment methodology in respect of suppliers. This methodology is focused on several modern slavery risk factors such as industry sector, jurisdiction and the type of entity providing the services or goods to Nearmap. Based on this methodology and given the nature of Nearmap's business, we consider the risk of modern slavery in our global operations and supply chain to be relatively low.

We do, however, acknowledge and recognise the need to continually monitor and assess our supply chain and partner network, particularly regarding Nearmap's procurement of IT hardware and outsourcing services. In respect of these, the majority of our suppliers are located in jurisdictions where we consider the modern slavery risk to be low, although certain suppliers are located in jurisdictions where there may be higher risk of modern slavery including Nepal and India given that according to the Global Slavery Index 2023 ("GSI"), these countries have a higher prevalence of migrant labour or vulnerable workers.

ADDRESSESING MODERN SLAVERY RISKS

Nearmap has maintained its framework to identify and address modern slavery risks in our supply chain and business operations. This framework is summarised below:

- 1. **Due diligence.** This involves assessing the potential supplier within the context of the jurisdiction in which they operate, and the goods and services intending to be procured;
- 2. Supplier Code of Conduct ("Code"). This sets out our expectation that suppliers will operate in full compliance with laws and regulations with regard to human rights, labour rights, workplace health and safety, environmental management and modern slavery. Nearmap expects suppliers to influence their own supply chain to adopt a safe, fair and ethical approach to their operations and to demonstrate adherence with the Code. In the event that a supplier identifies an occurrence or material risk of modern slavery in their supply chains or operations they are required to take immediate practical and effective steps to address that occurrence or risk. Suppliers must notify Nearmap as soon as practicable of any compliance issues that have been identified and notify relevant authorities where appropriate;
- 3. Supplier Agreements. Nearmap requires supplier contracts to include obligations that the supplier must: (i) take reasonable steps to identify, assess and address risks of modern slavery practices in their operations and supply chains; and (ii) inform Nearmap if the supplier becomes aware of modern slavery practices in its operations and supply chains, and to take action to address, remediate or remove such practices;
- 4. Training. Nearmap requires its employees to undertake regular training, including as part of onboarding to commence employment, regarding what modern slavery may look like in Nearmap's operations and supply chain, the risk it poses to Nearmap and the practical checks that can be undertaken as part of supplier due diligence to ensure that instances of modern slavery are identified; and
- 5. Continuous improvement. Nearmap has existing processes to continually enhance its broader compliance framework and, as part of this, has identified improvement opportunities in respect of modern slavery, which Nearmap is proactively exploring with plans to implement in due course.



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ASSESSING OUR MEASURES

Nearmap has an ongoing commitment to review the policies and processes in place to assess the effectiveness of identifying and managing modern slavery risks within its business operations and supply chain. Accordingly, Nearmap continues to:

- refine its supplier contracting process to ensure suppliers are committing to mitigating modern slavery risks within their operations;
- provide regular training to all employees to ensure that they are aware of and recognise modern slavery risks, and are familiar with the reporting protocols; and
- engage with high-risk suppliers to ensure they implement mitigation strategies to minimise modern slavery risks in their businesses.

CONSULTATION AND APPROVAL

This Statement is made in accordance with the Act and constitutes Nearmap's Modern Slavery Statement for the FY24 Reporting Period.

This Statement was approved by the Board of Directors of Atlas on 20 July 2025.

Andrew Watt Director

Atlas AU Holdco Pty Ltd DATE: 31 July 2025