



# MODERN SLAVERY STATEMENT

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## INTRODUCTION

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This Statement is Nearmap Ltd's first Modern Slavery Statement ("**Statement**") and covers the period of 1 July 2020 to 30 June 2021 ("**Reporting Period**").

This Statement applies to Nearmap Ltd, all subsidiary entities, their affiliates and related bodies corporate (together, "**Nearmap**", "**we**", "**us**" or "**our**"). Nearmap has subsidiaries across Australia and the United States.

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

## OUR BUSINESS, STRUCTURE & OPERATIONS

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Nearmap is a leading provider of cloud-based geospatial information services and an innovative location intelligence company. Nearmap captures a rich data set of the real world, providing high value insights digitally to a diverse range of more than 11,000 businesses and government organisations. Every day, Nearmap helps hundreds of thousands of users conduct virtual site visits for deep, data-driven insights, enabling businesses and government organisations to make informed decisions, streamline operations and bolster bottom lines.

Nearmap is headquartered in Sydney, Australia and as at 30 June 2021 employed approximately 368 staff across Australia and the United States of America. Our U.S. offices are in Salt Lake City (Utah), Arlington (Virginia) and New York City (New York).

## OUR POSITION ON MODERN SLAVERY

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As a business, Nearmap is committed to conducting operations by respecting its employees and treating everyone fairly and consistently to create 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 shown through identifying and managing all forms of risks related to human rights across our business and through the management of our supply chain which is set out in our Global Modern Slavery Policy.

## GOVERNANCE FRAMEWORK

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The Corporate Code of Conduct outlines the ethical standards expected of all our directors, employees, contractors, sub-contractors, 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. The Board of Nearmap recognise that a strong governance framework must be maintained and reviewed on a regular basis. The Board through the 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.

## MODERN SLAVERY RISKS

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Nearmap developed a risk assessment methodology and performed an assessment of 446 suppliers across all markets in which we operate. The assessment focused on a number of risk factors such as industry sector, jurisdiction and the type of entity providing the service or goods to Nearmap.

We consider the risk of modern slavery in our global operations and supply chain to be relatively low based on the location of our suppliers, the nature of the goods and services we acquire and the highly technical nature of our business. However, we also acknowledge and recognise that we must continue to monitor and assess our supply chain and partner network, particularly in the following risk areas:

1. **IT hardware** – whilst most of our hardware providers are located in lower risk jurisdictions, we do have some suppliers located in the Philippines, Malaysia, India, South Africa and China. According to the Global Slavery Index<sup>1</sup> (“**GSI**”) these countries have a higher prevalence of migrant labour or vulnerable workers; and
2. **Outsourcing** – most of our outsourced services are performed by the service providers directly in jurisdictions where there are strict employment requirements to minimise any risk of modern slavery. However, we do have suppliers located in India, the Philippines and Nepal which we will continue to monitor to ensure these suppliers are adhering to local laws.

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<sup>1</sup> Walk Free Foundation (2018) Global Slavery Index, available from: [www.globalslaveryindex.org](http://www.globalslaveryindex.org).

## ADDRESSING MODERN SLAVERY RISKS

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Nearmap commenced work to enhance internal processes to mature and centralise elements that will improve our controls and oversight of our supply chain and business operations. The enhancements that progressed during the Reporting Period are summarised below.

### DUE DILIGENCE

Nearmap undertook a high-level scoping and mapping exercise of our global operations and supply chain to identify high-risk suppliers, analysing the jurisdiction in which they operate, and the product and services being procured.

### RISK ASSESSMENT

Nearmap ranked its suppliers according to the GSI and a number of factors were considered when assessing modern slavery risk and vulnerabilities in the supplier’s operations, including but not limited to:

- the countries in which operations and supply chains exist (giving regard to governance frameworks, and human rights track record);
- the industry sector involved;
- business relationships and the entities involved in the supply chain tiers; and
- the types of products and services produced.

Nearmap introduced a Modern Slavery Supplier Questionnaire (“**Questionnaire**”). This Questionnaire is required to be completed by all new and existing suppliers. The Questionnaire provides Nearmap with a greater understanding of the risk within a supplier’s supply chain or operations and

enables risk mitigation strategies to be implemented where appropriate. Nearmap will actively and progressively improve our understanding and oversight of all tiers of our supply chains.

## SUPPLIER CODE OF CONDUCT

The Supplier Code of Conduct (“**Code**”) 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.

## SUPPLIER AGREEMENTS

All future contractual terms will reflect the requirements as outlined in the Supplier Code of Conduct including compliance with the Act and those foreign modern slavery laws that apply in the location(s) in which they operate.

## TRAINING

Nearmap will conduct annual training for its employees to highlight what modern slavery might look like in our operations and supply chain, the risk it poses to Nearmap and what practical checks can be undertaken as part of supplier due diligence to ensure that instances of modern slavery are identified.

## ASSESSING OUR MEASURES

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Nearmap will continue to review the policies and processes in place to assess the ongoing effectiveness in identifying and addressing modern slavery risks within business operations and the supply chain. Nearmap will continue to:

- refine supplier contracts to ensure suppliers are committing to mitigating modern slavery risks within their operations;
- provide training to all employees to ensure that they are aware and recognise modern slavery risks and the reporting protocols; and
- engage with our high-risk suppliers to ensure they are implementing mitigation strategies to minimise their risk.

## CONSULTATION AND APPROVAL

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

This Statement was approved by the Board of Directors of Nearmap on 20 December 2021.



**Rob Newman**  
CEO of Nearmap Ltd  
20 December 2021