

# 2021 MODERN SLAVERY STATEMENT

GARMIN AUSTRALASIA PTY LTD.

#### Describe the reporting entity's structure, operations and supply chains

Garmin Australasia Pty Ltd. (the "Company" or "Garmin Australasia") is a company incorporated and domiciled in Australia. The Company's ultimate parent is Garmin Ltd., a company registered in Switzerland. The Company has one wholly owned branch, Garmin Australasia Pty Ltd – New Zealand Branch ("New Zealand Branch"), which operates and is domiciled in New Zealand. The Company and the New Zealand Branch's principle business activities are importation, distribution, marketing and sale of navigation, communication, and information devices and applications, many of which feature location technology such as the Global Positioning

System. The Company also provides marketing and product support services in Australia. Garmin Australasia had approximately 154 employees as of the date of this report.

Garmin Australasia's suppliers are other Garmin entities and related parties within the Garmin group. The Company only sells products supplied from Garmin affiliates, who also manufacture the vast majority of products sold by the Company. Garmin manufacturing operations are located in Taiwan, People's Republic of China, the United States of America, Poland and the Netherlands.

## Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

Garmin Australasia is primarily engaged in the importation, distribution, marketing, and sale of electronics and consumer goods to customers in Australia. As an electronics and consumer goods distributor, Garmin Australasia recognizes that modern slavery risks may be present in the supply chains for these products. The Garmin group mitigates many of these risks through its vertically integrated business model in which Garmin affiliates manufacture a vast majority of the products sold by the Company.

Individuals employed by all Garmin companies, including Garmin Australasia and the Garmin affiliates that manufacture products, are subject to Garmin's <u>Code of Conduct</u> and <u>Modern Slavery Policy</u>. 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 within our own operations and throughout our supply chain; and
- establishes our policy on respecting all employees' rights to freedom of association and freedom of movement.

Upstream suppliers to Garmin's manufacturing companies are required to comply with Garmin's <u>Supplier Code of Conduct</u>, which sets forth expectations on human rights and labor 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. Therefore, Garmin Australasia believes that the risk of modern slavery in Garmin Australasia and throughout the entire Garmin groups' operations is mitigated.

## Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

Garmin Australasia 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 guidelines and policies covering human rights, freedom of association, and freedom of movement. Garmin's whistleblower policy also provides confidentiality and protection to any individuals who raise concerns.

If any form of modern slavery is discovered in our own operations or in our supply chain, corrective action and remediation is performed. There were no instances of modern slavery found within or reported to the Company in the year ended Dec. 31, 2021.

#### Describe how the reporting entity assesses the effectiveness of these actions

As the Company's suppliers are related Garmin entities, the Company has confidence that controls and processes are in place to ensure compliance with global policies relating to human rights and modern slavery. Garmin's global group conducts a top-down governance model on corporate

responsibility matters, including those pertaining to human rights and modern slavery, and evaluates the effectiveness of actions on a regular basis and implements remediation plans when necessary.

### Describe the process of consultation with any entities the reporting entity owns or controls

The New Zealand Branch is subject to the same global policies relating to human rights and modern slavery as the Company.

#### The impacts of COVID-19

Garmin has taken additional measures to provide a safe and healthy work environment for employees and guests of our facilities. Garmin has provided additional benefits to assist employees during the COVID-19 pandemic, which may include flexible work arrangements, remote work access and flexible paid leave policies.

As uncertainty in supply chains caused by COVID-19 may increase modern slavery risks, Garmin has focused on maintaining positive relations with our suppliers and conducting continual evaluation of our supplier expectations and <u>Supplier Code of Conduct</u>. Garmin has also implemented strategies to manage inventory levels and safety stock to reduce the risk of undue hardships placed on suppliers.

This Modern Slavery Statement was approved by the Board of Directors of Garmin Australasia Pty Ltd.



Matthew Thomas, Director