


GARMIN.

UK MODERN SLAVERY ACT 2015 STATEMENT

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 28 December 2024 for Garmin (Europe) Ltd. (“Garmin Europe”) and its subsidiaries Global Lighting & Vision Systems Ltd. and Lumishore Ltd. (together, the “Subsidiaries”; collectively with Garmin Europe, the “Companies”, “we”, or “our”).

OUR STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

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Garmin Europe and the Subsidiaries are incorporated and domiciled in the United Kingdom. The Companies’ ultimate parent is Garmin Ltd., a company registered in Switzerland. The Companies’ 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. Lumishore Ltd. also designs, manufactures, distributes and sells LED lighting systems for boats. As of 28 December 2024, Garmin Europe and the Subsidiaries had more than 450 employees.

The majority of the products the Companies sell are supplied from Garmin Corporation, a Taiwanese company, and other subsidiaries of Garmin Ltd. (collectively, the “Garmin Group” or “Garmin”). Garmin-owned manufacturing operations are located in Taiwan, People’s Republic of China, the United States, Poland, the Netherlands, and the United Kingdom.

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

RISKS OF MODERN SLAVERY PRACTICES IN OUR BUSINESS AND SUPPLY CHAINS

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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 Companies believe there is a very low risk of modern slavery practices 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 Companies) mitigates the risk of modern slavery 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 MODERN SLAVERY, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

The Companies follow 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 adhere to the Code of Conduct. 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. Additionally, Garmin's factories are subject to periodic compliance audits by many of our distributors and other resellers to confirm our compliance with applicable laws, regulations, and international labour and human rights standards.

Upstream suppliers to Garmin are required to follow the Garmin [Supplier Code of Conduct](#). Additionally, Garmin's standard supply agreements require suppliers to assure Garmin 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 forced labour, child labour, and other human rights issues.

Employees are required to report all suspected instances of modern slavery. Garmin promptly investigates any concerns relating to potential violations of our Code of Conduct reported through the methods set forth in our Code of Conduct and Modern Slavery Policy, including the anonymous compliance helpdesk. Garmin's whistleblower policy provides confidentiality and protection against retaliation to any individuals who raise concerns. If any form of modern slavery were to be discovered in Garmin's own operations or in Garmin's supply chain, corrective action and remediation would be 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 Companies in the fiscal year ended 28 December 2024.

HOW WE ASSESS THE EFFECTIVENESS OF OUR MEASURES TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

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The Companies have confidence that controls and processes are in place to ensure compliance with Garmin's global policies relating to human rights and modern slavery. Reports of violations are an indicator of the effectiveness of our measures. Garmin 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.

For facilities owned or leased by Garmin Europe and Subsidiaries, the Companies directly verify that all of its employees have freedom of movement, freedom of association and are employed voluntarily. Any employee of the Companies who had a concern that this is not the case would have a mandatory obligation to report their concern through various reporting channels, including through an anonymous whistleblower helpdesk. No concerns have been reported, and no violations have been found.

For the Companies' third-party suppliers, the Garmin [Supplier Code of Conduct](#) requires suppliers to ensure that all of their personnel have freedom of movement, freedom of association, are employed voluntarily and to comply with all other applicable requirements. Instances of noncompliance are subject to action, which may include termination of relationship with the supplier. Garmin's anonymous whistleblower helpdesk is available for anyone, whether internal or external to the Companies, to report concerns or suspected violations. None have been reported.

BOARD OF DIRECTORS APPROVAL AND ATTESTATION

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This Statement was approved in accordance with the UK Modern Slavery Act 2015 by the Board of Directors of Garmin (Europe) Ltd. on 25 June 2025.



Sean Biddlecombe
Managing Director, EMEA
Garmin (Europe) Ltd.
25 June 2025