



## Modern Slavery Statement for Financial Year 2024

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 for the financial year 2024, ending on 31 December 2024. This statement outlines the policies and procedures that Harley-Davidson Europe Ltd. has in place and the steps we take to reduce the risk of modern slavery and human trafficking within our business and in our supply chains.

We are committed to playing our part in helping to address this through identifying risk within our business operations, implementing policies and procedures, and working with others to take steps to prevent modern slavery and human trafficking in our supply chain.

### **1. Our structure and supply chains**

The entity in scope under the Modern Slavery Act is Harley-Davidson Europe Ltd., a limited liability company incorporated and carrying on a business in the UK. Harley-Davidson Europe Ltd. is (i) selling goods in the UK or abroad; (ii) distributing goods in the UK or abroad; and (iii) importing into the UK goods produced outside of the UK.

Harley-Davidson Europe Ltd. imports and sells Harley-Davidson motorcycles, motorcycle parts, accessories, and apparel to retail customers through a network of independent dealers in Europe, the Middle East and Africa.

The Harley-Davidson group operates in approximately 50 global markets with over 5,700 employees. In the UK, Harley-Davidson Europe Ltd. employs approximately 60 employees.

Purchasing is carried out at two different levels in our supply chain:

- a. purchase and distribution of manufacturing motorcycles, motorcycle parts, accessories, and apparel; and
- b. procuring services, such as marketing services, events management services, and logistics services.

### **2. Policies in relation to slavery and human trafficking**

#### I. The Harley-Davidson Code of Conduct

Our global **Code of Conduct** affirms that we do not use, nor do we allow any of our employees, contractors or suppliers to use, forced or involuntary labour.

All employees and contractors are required to adhere to the Code. Further, our Code of Conduct requires all employees and contract workers to report actual or possible instances of a breach of our Code of Business conduct. In this regard, employees and contract workers are encouraged to speak to their manager, senior management, or human resources or compliance staff, or report through our Code of Business conduct helpline. Non-compliance is subject to investigation and corrective action, up to and including termination.

Our Code of Conduct helpline allows Harley-Davidson's stakeholders (i.e., customers, suppliers, trade unions, regulatory authorities, etc.) to report in confidence any breaches of the law, our Code of Conduct, or other internal policies. All reports through this system are processed and investigated as applicable, and appropriate measures are taken when justified.

In addition, our Supplier Code of Conduct states: “*our suppliers’ operations must be free of unsafe and unfair work practices including slavery, forced labour, prison labour, human trafficking or child labour.*”

## II. Non-Retaliation Policy

To supplement our Code of Business conduct helpline, we also have in place a strict **nonretaliation policy** whereby the company will not take any action against the whistleblower as a result of reporting in good faith.

## III. Contracting Policy

We use a **Standard Supplier Contract** which requires our suppliers to represent and undertake to ensure that all products and services are provided in accordance with all applicable laws, which in this case includes the Modern Slavery Act 2015. It also requires the supplier to observe Harley-Davidson's work policies. Execution of our form of Standard Supplier Contract by our suppliers of goods and services is an essential condition for obtaining a commercial partnership with Harley-Davidson Europe Ltd. Our Apparel & Licensing suppliers are required to certify that their products comply with laws prohibiting human trafficking and forced labour and to attest to their compliance with applicable laws and ethical standards.

This applies to all suppliers of goods and services except where it is not feasible, for e.g. telecommunications suppliers or car leasing companies. In these cases, the suppliers will insist on contracting on their form of contract and we ensure that the suppliers have similar undertakings in their contracts regarding provision of products and services in accordance with applicable laws.

## IV. Responsible Purchasing Process

All purchasing activity across our extensive and global supply chain is based on a common framework. Harley-Davidson's **Responsible Purchasing Process** aims to manage and reduce environmental and societal risks associated with our supply chain. It is a direct extension of our Code of Conduct.

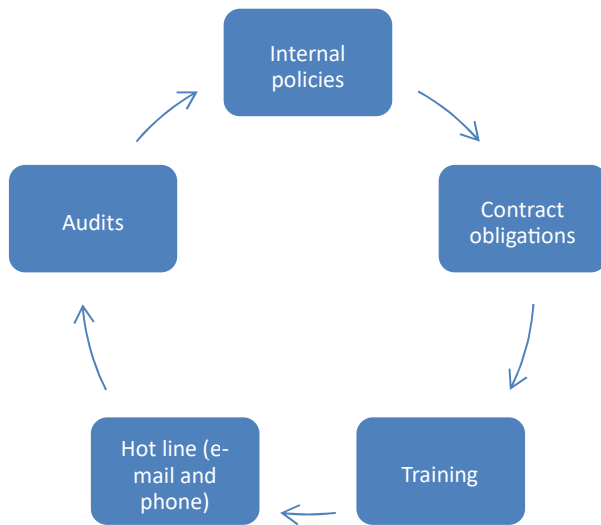
### 3. **Due Diligence Processes**

Harley Davidson has established the following due diligence processes:

- All new suppliers undergo due diligence during on-boarding which includes screening for human trafficking and forced labor concerns;
- Once a supplier has undergone due diligence, they are subjected to continuous monitoring for any changes;
- Apparel suppliers are audited during on-boarding, which includes auditing their compliance with our policies prohibiting human trafficking and forced labour; existing supplier are audited biennially;
- Semi-unannounced audits of apparel suppliers by third-party associations.
- If a red flag is identified during due diligence we will require the supplier to cooperate in the remediation of the identified risk.

### 4. **Risk Assessment and Management**

Modern slavery and human trafficking risks in our apparel supply chain are identified through five main components:



Apparel suppliers deemed to have a high risk through our risk assessment process will be invited to undertake an assessment through our dedicated assessment tool which produces ratings and detailed scorecards through an evidence-based assessment to understand a supplier's performance. This assessment is adapted to reflect business categories and takes into account relevant industry certifications in several countries and is aligned with global standards like the United Nations Global Compact. The areas assessed through this digital audit include the presence of and efforts to eliminate or reduce occurrences of modern slavery and human trafficking.

We engage specialized consultants to perform digital due diligence and background checks. We utilize our own trained internal audit resources as well as third party auditors to perform audits adapted to the specific circumstances of the suppliers being audited.

After completion of this assessment, we may categorize our suppliers as low, medium or high risk, using audit and due diligence information. Depending on the level of risk identified, the validity period of the assessment is determined and where required a corrective action plan is implemented, and if necessary an on-site audit may be carried out by our specialized consultants to work with the supplier to improve their performance.

We recognize that our risk assessment process is subject to ongoing refinement and improvement. Each year we review our risk assessment process and try to eliminate possible gaps in the process.

## 5. Assessing our effectiveness

We intend to continue to assess and refine key performance indicators to measure the effectiveness of all our policies and continuously improve our approach to human rights. The effectiveness of Harley-Davidson Europe Ltd.'s due diligence process is regularly evaluated to confirm it remains current and aligned with business activities, regulatory developments, industry standards and best practices. By doing so, Harley-Davidson Europe Ltd. adheres to all applicable laws and regulatory requirements in the jurisdictions in which we operate, including guidance on risk related to modern slavery and human trafficking.

No instances of risks related to modern slavery, human trafficking or forced labour were raised for review in 2024.

## 6. Training on Modern Slavery and Trafficking

Understanding and complying with the Code of Conduct is a condition of working at the Harley-Davidson group, and employees and contract workers must complete the Code of Conduct

training course and acknowledgment annually. We leverage this mandatory annual course to train all employees and applicable contract workers to look for indicators of possible violations of human rights. In addition, specific training modules are provided to teams within Apparel & Licensing, Direct Procurement and Parts & Accessories.

#### **7. Risks of modern slavery and human trafficking in our operations and supply chains**

To the best of our knowledge, we have not identified risks of modern slavery and human trafficking in our operations and supply chains. As noted above, our risk assessment process is reviewed annually with the goal of identifying possible gaps in our assessment.

#### **8. Approval for this statement**

This statement was reviewed and approved on 30 June, 2025.

Andrev Gatha

Company Secretary