



## **Modern Slavery Statement for Financial Year 2022**

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Harley-Davidson Europe Ltd. has taken and continue to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Harley-Davidson is committed to ensuring our operations and supply chains are free from involuntary labor and human trafficking. This commitment applies to all Harley- Davidson employees, officers and directors as well as all individuals and entities doing business with and for Harley-Davidson.

### **Our business:**

Harley-Davidson Motor Company was founded in 1903. Harley-Davidson, Inc. was incorporated in 1981, at which time it purchased the Harley-Davidson® motorcycle business from AMF Incorporated in a management buyout. In 1986, Harley-Davidson, Inc. became publicly held.

Harley-Davidson, Inc. is the parent company for the groups of companies doing business as Harley-Davidson Motor Company (HDMC) and Harley-Davidson Financial Services (HDFS). Harley-Davidson Inc. is the ultimate parent of Harley-Davidson Europe Ltd.

Harley-Davidson, Inc. operates in two segments: the Motorcycles & Related Products (Motorcycles) segment and the Financial Services segment. While the two segments are strategic business units that offer different products and services and are managed separately based on the fundamental differences in their operations, the two segments work closely together as described below.

The Motorcycles segment designs, manufactures and sells at wholesale on-road Harley-Davidson motorcycles as well as a line of motorcycle parts, accessories, apparel, licensing and related services. Harley-Davidson Europe Ltd. sells the company's products to retail customers through a network of independent dealers in Europe, the Middle East and Africa.

The Financial Services segment consists of HDFS which provides wholesale and retail financing and insurance and insurance-related programs primarily to Harley-Davidson dealers and their retail customers. HDFS conducts business principally in the United States and Canada. In Europe, Middle East and Africa, HDFS also conducts its business through its European subsidiary, Harley-Davidson Financial Services Europe Ltd.

### **Our policies:**

Harley-Davidson Inc. has the following internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Code of Conduct. A global Code of Business Conduct is applicable to all individuals working for Harley-Davidson worldwide including direct employees and contract staff.



Employee Commitment. Employees and individuals who fail to follow Harley-Davidson's processes and policies prohibiting involuntary labor and human trafficking are subject to discipline.

**Our Supply Chain:**

Harley-Davidson has direct relationships with our Tier 1 suppliers and we have the following policies in place in connection with our supply chain.

Supply Agreements. Harley-Davidson has a contract policy that requires "all" commitments to be in writing. We have Master Supply Agreements with our Tier 1 suppliers, which includes an obligation to comply with our Supplier Code of Conduct (further explained below), that prohibit suppliers from using involuntary or forced labor in the production of goods for Harley-Davidson. In addition, we have implemented a process for our direct suppliers to regularly certify that the materials incorporated into the product sold to Harley-Davidson comply with the laws regarding slavery and human trafficking of the country or countries where they conduct business.

Supplier Onboarding Process. As part of our standard supplier onboarding process, Harley-Davidson performs a Quality Management System evaluation taking a risk-based approach. If a supplier is found to be of high risk, the issue is escalated and we will launch an investigation which includes an on-site audit.

Supplier Code of Conduct. Harley-Davidson has a global Supplier Code of Conduct which is given to our Tier 1 suppliers as part of our supplier onboarding process. The Supplier Code of Conduct contains language clearly prohibiting the use, of any form of slave, forced, bonded, indentured or involuntary labor, regardless of local business customs. Most recently, we are requesting our new and existing Apparel/Accessory suppliers to sign a Forced Labor affidavit to affirm that the production of goods for Harley-Davidson are not mined, produced, or manufactured wholly or in part by forced labor.

Monitoring. To ensure continued compliance by our suppliers, we conduct an annual review of our supply base by sending out required questionnaires which include questions regarding their labor practices.

**Approval for this statement.**

This statement was approved on July 3 2023

*Andrew Gatha*

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Company Secretary