

California Transparency In Supply Chains Disclosure

GN Netcom requires its supply chain to adhere to and reflect GN Netcom's company values and respect for human rights. GN Netcom's efforts to eliminate slavery and human trafficking in its supply chain are described in the following:

1. **Verification:** GN Netcom has adopted written policies and procedures that prohibit the use of slavery and human trafficking in its direct supply chain.
 - **UN Global Compact:** GN Netcom is a strong supporter of the 10 UN Global Compact principles, including human and labor rights. As a part of the GN Store Nord Group, GN Netcom is a signatory to the UN Global Compact and annually reports on its progress implementing the 10 principles.
 - **GN Netcom's Responsible Sourcing** brochure signed by GN Netcom's CEO acts as a training tool with regards to GN Netcom's requirements on human rights and labor rights.
 - **Supplier Selection, Qualification and Evaluation:** GN Netcom's purchasing and supplier selection policies and procedures requires that potential new suppliers must complete and pass a survey designed for assessment of potential suppliers. These surveys are conducted by GN Netcom personnel and include verification of compliance with applicable labor laws, including laws which ban slavery and human trafficking.
 - **General Supplier Agreements:** GN Netcom's agreements with its suppliers require suppliers to comply with all conventions and applicable laws, including labor laws.
 - **Supplier Code of Conduct:** GN Netcom requires its suppliers to comply with the [GN Netcom Code of Conduct](#). This includes compliance with provisions requiring suppliers to adopt solid labor practices and treat their workers fairly and in accordance with local laws and regulations. Furthermore, suppliers may not use any form of forced labor, whether in the form of human trafficking, slavery, bonded labor, or otherwise. Suppliers may not use materials which were manufactured using forced labor.
2. **Certification:** GN Netcom's suppliers are either certified or follow the requirements of SA8000, an international Social Accountability Standard, requiring the suppliers to ban the use of any form of forced labor. This is being assessed through supplier audits as described below.
3. **Audits:** GN Netcom auditors assess compliance with the requirements of its policies and procedures on an ongoing basis. Compliance is assessed based on the reports prepared as part of a supplier self-audit and by monitoring the supplier. Supplier monitoring by

GN Netcom auditors and personnel consists of on-site inspections of supplier facilities, questionnaires, review of publicly available information and other sources and measures deemed necessary to correctly assess the suppliers' performance.

4. **Accountability Standards:** GN Netcom's agreements with its suppliers and the GN Netcom Code of Conduct allow for the termination of any supplier found to violate the laws prohibiting forced labor, slavery and human trafficking. For GN Netcom employees, the GN Netcom [Ethics Guide](#) dictates compliance with labor laws in all jurisdictions where GN Netcom does business. Employees found to violate applicable labor laws, may be disciplined up to and including termination. The GN Alertline allows whistleblowers to report possible issues regarding non-compliance.
5. **Employee Training:** GN Netcom conducts training of employees whose job functions include procurement and/or supplier quality. These training sessions stresses the importance of having suppliers adhere to GN Netcom's Code of Conduct, including prohibitions on slavery and human trafficking.

GN Netcom continues to review and update its policies and procedures to ensure appropriate and adequate protection against any mistreatment of persons involved in its direct supply chain.