Modern Slavery and Human Trafficking in the Supply Chain

This statement is published in compliance with the requirements of the "UK Modern Slavery Act" (2015), the "California Transparency in Supply Chains Act" (2012) and other similar national and international legislation and sets out the measures taken by GN Group to prevent modern slavery and human trafficking in our supply chain for the financial year 2021.

GN Store Ncrl A/S (GN Group) is headquartered in Ballerup, Denmark and is a global leader in intelligent audio solutions. GN Group, is the parent company of GN Audio A/S and GN Hearing A/S. GN Audio A/S sells advanced headset solutions for the professional and consumer segments and GN Hearing A/S is a global market leader in high quality medical device grade hearing aids. This document applies to all GN Group and its affiliates.

GN Group has approximately 6500 employees worldwide and operates in 50+ countries across the world. Based on the markets we operate in and the nature of our industry, we assess the risk of human trafficking and modern slavery in our supply chain to be very low.

To prevent modern slavery and human trafficking, GN Group requires its supply chain to adhere to and reflect GN group’s company values and our dedication to uphold human rights. GN group’s efforts to avoid modern slavery and human trafficking in its supply chain are described in the following:

1. GN Group has adopted written policies and procedures that prohibit the use of modern slavery and human trafficking in its supply chain.

   a) GN Group is a strong supporter of the 10 UN Global Compact principles, including human and labor rights. GN Group has been a signatory to the UN Global Compact since 2010 and annually reports on its progress in implementing the 10 UN Global Compact principles.

   b) GN Group’s purchasing and supplier selection policies and procedures requires that potential new suppliers must complete a survey designed for assessment of potential suppliers. These surveys are conducted by GN personnel and include verification of compliance with applicable labor laws, including laws that ban slavery and human trafficking. Approval of a supplier is dependent on satisfactory results in the survey.

   c) GN Group’s agreements with its suppliers, require suppliers to comply with all conventions and applicable laws, including labor laws.

   d) GN Group requires its suppliers to comply with the GN Ethics Guide as well as the applicable GN Code of Conduct and Responsible Sourcing standards. 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 also may not use materials which were manufactured using forced labor.
2. GN Group encourages suppliers to be certified or follow the requirements of SA8000, an international Social Accountability Standard, requiring the ban of any form of forced labor. This is being assessed through supplier audits as described below.

3. GN Audio A/S and GN Hearing A/S internal auditors (GN auditors) assess compliance with the requirements of our policies and procedures on an ongoing basis. Compliance is assessed based on supplier self-assessment and by monitoring the supplier. Supplier monitoring by GN auditors and other personnel consists of on-site inspections of supplier facilities, questionnaires, review of available information as well as other sources and measures deemed necessary to correctly assess the suppliers' performance.

4. GN Group supplier agreements and the respective Code of Conduct allow for the termination of any supplier found to violate the laws prohibiting forced labor, slavery and human trafficking. For all GN employees, the GN Ethics Guide dictates compliance with labor laws in all jurisdictions where GN Group does business. Employees found to violate applicable labor laws may be subject to disciplinary action up to and including termination. The "GN Alertline" allows whistleblowers to report potential issues regarding non-compliance.

5. In addition to mandatory online training on the GN Ethics guide that all GN employees must complete yearly, GN Group conducts training of employees whose job functions include procurement and/or supplier quality. These training sessions stress the importance of having suppliers adhere to the GN Ethics Guide and Code of conduct, including prohibitions on slavery and human trafficking.

GN Group 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.

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