



Code of conduct

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Introduction

Background

Through its brand Jabra®, GN Audio is a global leader in the market for intelligent audio solutions. Jabra believes that it is important to behave in a socially and ethically exemplary way. We believe that we are responsible for the people who take part in the production and support of our products and services world-wide. We believe that people whose work contributes to our success should not be deprived of their basic human rights, nor be forced to suffer physically or mentally from their work in any way.

Purpose

Jabra expects employers to respect fundamental human rights, to treat their workforce fairly and with respect. In order to make our position clear to our suppliers, and any other affected parties, we have documented a Code of Conduct.

Application

This directive is applicable to all Jabra operations as well as Jabra suppliers.

Legal requirements

All of our suppliers must, in all activities, obey national and regional statutory requirements in the countries in which they are operating. Should any of the requirements stated in this document be in violation of the law in any country or territory, the local law should always take precedence. In such case, a supplier must immediately inform Jabra. It is, however, important to understand that Jabra's requirements are not limited to the requirements of national laws.

Workers' rights

Basic human rights

Anyone who works directly or indirectly for Jabra must be entitled to his or her basic human rights. Jabra does not accept the use of bonded workers, child labour, forced labour, prisoners or illegal workers. If foreign workers are employed on a contract basis, they should never be required to remain in employment against their will. The employer covers all commissions and the recruitment agency fees.

We do not accept that workers are subject to corporal punishment, mental or physical disciplinary action or harassment. Dismissal of female workers due to pregnancy or any other reason is not acceptable. We recommend that all workers are free to peacefully and lawfully join associations of their own choosing, and have the right to bargain collectively.

No worker should be discriminated against because of age, race, gender, religion, and sexual orientation, marital or maternity status, political opinion or ethnic background. We recommend that all workers with the same experience and qualifications receive equal pay for equal work.

Wages and working hours

All workers must know the basic terms and conditions of their employment.

Legislated minimum wages must be a minimum, rather than a recommended level. Wages must be paid regularly and on time. A normal workweek must not exceed the legal hourly limit, and all overtime work must be properly compensated.

Workers must be granted stipulated annual leave; sick leave and maternity/paternity leave without any form of repercussions as defined by the labour laws.

Safety

Building and fire safety

Jabra requires that worker safety is always a priority concern. Buildings must have clearly marked exits, and emergency exits on all floors. We recommend that all exit doors should open outwards. Exits should not be blocked and must be visible. All workers shall be informed of the safety arrangements. An evacuation plan must be displayed on every floor of a building and the fire alarm must be tested regularly. Regular evacuation drills are recommended.

First aid

First aid equipment must be available in a building, and at least one person in each department must be trained in basic first aid. It is recommended that a doctor or nurse is available on short notice in the event of an accident on the premises. The employer must cover the costs (not covered by social security) of medical care for injuries incurred on their premises.

Workplace conditions

It is important for all workers' wellbeing, that chemicals are handled in a safe and correct way. All chemicals shall be marked, and labelled in a correct way. Training and instructions for handling chemicals must be performed and workers must have adequate body protection.

The temperature and noise level of the work environment must be tolerable. Ventilation must be adequate. Lighting must be sufficient for the work performed.

The workplace must have an adequate number of clean sanitary facilities, which are preferably separated for men and women. Workers must have access to these facilities without unreasonable restrictions.

Housing conditions

Where staff's housing facilities are provided, we require that workers' safety is a priority concern.

The recommended safety and workplace conditions described above are applicable to these housing facilities. All workers should be provided with their own individual bed, and the living space per worker must meet the minimum legal requirement.

Dormitories, toilets and showers must be separated for men and women. There should be no restriction on workers' rights to leave the dormitory during off-hours.

Fire alarms, fire extinguishers, unobstructed emergency exits and evacuation drills are of particular importance in dormitory areas.

Environmental issues

The environment is of increasing concern globally and Jabra expects its suppliers to comply with applicable environmental laws and regulations and fulfill the terms of Jabra environmental requirements.

Child labour

Definition of child

A child in this context is a person younger than 15 years of age. This is in accordance with the exceptions for developing countries as set out in Article 2.4 in the ILO Convention No. 138 on Minimum Age, which here is 14 years.

Child labour code

Jabra bases its child labour code on the UN Convention on the Rights of the Child, article 32.1. We “recognize the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s health or physical, mental, spiritual, moral or social development.”

Implementation of child labour code

Jabra does not accept child labour. We acknowledge that it exists and realize that it cannot be eradicated by simply setting up rules or inspections, but by actively contributing to the improvement of children’s social situations. Thus, we endeavor to improve the situation for any child affected by our ban on child labour. Jabra will request that the employer act in accordance with the overall best interests of the child. A satisfactory solution is whatever improves an individual child’s overall situation. The employer must cover the costs for this.

Enforcement of our child labour code

Jabra will discontinue co-operation with any party that persists in non-compliance with our child labour code.

Apprenticeship programs

Jabra accepts apprenticeship programs for children between the ages of 12 and 16 years in countries where the law permits such programs, but only under certain conditions. The total numbers of hours spent on light work and school together should never exceed seven hours per day. The employer must be able to prove that work is not interfering with the child’s education that apprenticeship is limited to a few hours per day, that the work is light and clearly aimed at training, and that the child is properly compensated. We will not accept apprenticeship programs that do not comply with these terms.

Special recommendations

Jabra acknowledges that according to Article 1 of the UN Convention on the Rights of the Child, a person is a child until the age of 18. We therefore recommend that children in the age group 16-18 be treated accordingly, i.e. by limiting the total number of working hours per day and implementing

appropriate rules for overtime. Children in this age group are not allowed to perform hazardous work.

Bribery and Kickbacks

Anyone who works or are associated with Jabra may under no circumstance directly or indirectly take any action to improperly influence public officials, business partners or other persons by offering bribes or kickbacks. Failure to act in accordance with this policy may potentially harm GN Audio's reputation and brand, and may put Jabra at risk for legal penalties, and will result in immediate termination of your engagement with GN Audio.

In short, bribery is a crime in which money, a favor, or something else of value is promised to, given to, or taken from an individual or corporation in order to alter the behavior of the recipient in ways not consistent with the duties of that person or in breach of law. Kickbacks are payments or offering of services made to someone for referral of a customer or business.

Incidents involving bribery and/or kickbacks must be reported immediately to GN Audio.

Anonymous reports can be done by making use of GN Store Nord A/S' Whistleblower Hotline which is available on www.gn.com.

Monitoring and enforcement

The principle of trust and co-operation

Jabra expects all its workers, suppliers and their subcontractors to respect this Code of Conduct and to actively do their utmost to achieve its standards. We are prepared to co-operate with our suppliers to achieve adequate solutions. We are also prepared to take cultural differences and other relevant factors into consideration, but we will not compromise on the fundamental requirements described in this document.

Monitoring

All suppliers are obliged to keep Jabra informed about where each order is produced. Jabra reserves the right to make unannounced visits to sites where people work directly or indirectly for GN Audio. We also reserve the right to let an independent party make inspection, and report findings to GN Audio, that will then take appropriate actions.