



Modern Slavery and Human Trafficking in the Supply Chain Statement

This statement sets out the measures taken by GN Group to prevent modern slavery and human trafficking in our own operations and supply chain. GN Store Nord A/S (GN Group) is headquartered in Ballerup, Denmark. GN Group sells headsets, speakerphones, and video gear for collaboration at work, as well as a broad range of gear for gaming enthusiasts. Our Hearing division is a market leader in high quality medical device grade hearing aids. This statement is lodged on behalf of all of GN Group, its affiliates and entities to meet the obligations of the “UK Modern Slavery Act” (2015) and the “California Transparency in Supply Chains Act” (2012), and other similar national and international legislation, as well as GN Hearing Australia Pty. Ltd., a reporting entity under the “Australia Modern Slavery Act” (2018).

GN Group has approximately 7,500 employees worldwide. Our operations are global, and we are connected to suppliers in 50+ countries across the world. GN Hearing Australia Pty. Ltd. does not have any subsidiaries and is based in Sydney, Australia with 121 employees, as well as markets a broad range of our hearing products.

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) Focus areas related to modern slavery risks

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 is an affiliate member of the Responsible Business Alliance (RBA), a non-profit coalition of electronics companies, committed to supporting the rights and well-being of workers in the global electronics supply chain. GN's Supplier Code is based on the RBA's best practice. As a member of the RBA, GN is required to implement management systems to protect workers' rights, and we work closely with our suppliers to implement the RBA Code and monitor conformance.
- c) GN Group's purchasing and supplier selection policies and procedures require 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.
- d) GN Group's agreements with its suppliers, require suppliers to comply with all conventions and applicable laws, including labor laws.



- e) GN Group requires its suppliers to comply with the Supplier 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 also may not use materials which were manufactured using forced labor.
- f) 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 whistleblower hotline enables whistleblowers to report potential issues regarding non-compliance.
- g) 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.
- h) When employees are hired by GN they are provided with an employment contract describing the terms and conditions of their employment. All workers are free to terminate their employment at any time and it is forbidden to hold employee ID or require workers to pay recruitment fees.

2) Actions taken to assess and manage modern slavery risks

GN Group has assessed the relevant human rights risks across both its own operations supply chain throughout a 'double materiality' assessment process. From this, we concluded on 4 negative impacts and one risk – of which two are relevant in terms of modern slavery.

- a) Due to the nature of our products, industry and location of manufacturing sites, we have identified negative impacts connected to child labor and other forms of forced labor, as well as risks of forced labor in the area of our value chain related to mining, manufacturing, and logistics. These impacts and risks are managed throughout our existing processes and supplier due diligence initiatives.
- b) GN Group evaluates the effectiveness of actions taken to address these impacts and risks to improve our transparency and accountability. We encourage suppliers to be certified or follow the requirements of SA8000, an international Social Accountability Standard, which prohibits any form of forced labor. This is being assessed through supplier audits as described below.
- c) GN Group'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.
- d) GN Group supplier agreements and the Supplier Code of Conduct allow for the termination of any supplier found to violate the laws prohibiting forced labor, slavery and human trafficking. In 2025, we performed a full review and update of our

Supplier Code of Conduct to ensure it is fully aligned with the code of conduct from RBA.

- e) We use reputable platforms such as EcoVadis and the Responsible Business Alliance to engage with our suppliers and value chain workers via credible proxies, such as through our own audits and supplier assessments, to enable actions that have insights into their situation.
- f) During the year, we onboarded 79% of our largest and most strategic suppliers on the EcoVadis platform, as well as conducted 52 supplier audits across China and Southeast Asia. Following these audits, we have worked with suppliers to implement all matters indicated under their corrective action plans, ensuring that they comply with our policy objectives under the Supplier Code of Conduct and other relevant policies.
- g) We have continuous and ongoing initiatives relating to forced labor and conflict minerals due diligence across all markets in which we operate. This is managed through our existing partnership with Greensoft Technology, who performs due diligence on our behalf focusing on 3TG conflict minerals and cobalt in our upstream value chain, such as in DRC and surrounding countries.

3) Assessing the effectiveness of our actions

To track the effectiveness of our initiatives and monitor the overall progress of policy implementation, we strive to both take actions and set targets that are measurable and relevant for our business.

- a) These metrics include acquiring human-rights related data and information, as well as third-party audit data, from our suppliers via reputable platforms, including EcoVadis and the Responsible Business Alliance.
- b) We have conducted a human rights impact assessment based on the UN Guiding Principles on Business and Human Rights to support the update of our sustainability strategy in order to develop targets for 2030. A main target of the program is to strengthen GN's human rights due diligence processes. This will allow for better identification of material impacts and risks connected to value chain workers and to track the effectiveness of our policies and actions when responding to these, while strengthening our ability to monitor progress and assess the effectiveness of the targets over time.
- c) We have divided the targets between our own operations and supply chain. Each target is designed to accomplish a specific improvement area relating to material impacts, such as poor working conditions, health and safety, discrimination, and lacking diversity and gender equality, in ongoing initiatives with our Tier 1 partners and Tier 2 suppliers. They also address areas further in our upstream value chain to mitigate impacts and risks associated with forced labor, human trafficking, and conflict minerals.
- d) As part of our targets, a key improvement area relates to strengthening our membership with the Responsible Business Alliance, as well as to undergo regular audits under the Validated Assessment Program (VAP), both at our own manufacturing sites and that of our Tier 1 and Tier 2 suppliers'.

- e) We will also strengthen our EcoVadis assessment, ensuring that GN Group improves its scorecard as a reporting company by achieving at least a score of 70/100.
- f) We are currently in process of updating our scope for conducting supplier audits by reviewing the sustainability checklists used by our teams conducting the audits. The aim of this is to ensure we are able capture and review data points from all suppliers relating to our material impacts, risks and opportunities.
- g) Finally, as part of our other supplier engagement programs, we plan to introduce code of conduct training from the Responsible Business Alliance for relevant GN functions through the RBA Academy. This training, through our existing Supplier Code of Conduct, which is aligned with RBA, will also be further rolled out and shared with our suppliers.

4) Consultation and approval

- a) GN Hearing Australia Pty. Ltd. does not control or own any other entities. GN Group has set processes for consulting all relevant subsidiaries and entities in preparing this statement. This ensures that GN Group considers any risks of modern slavery that may be relevant to any of its specific subsidiaries or entities.
- b) This statement has therefore been prepared with input from employees who oversee GN Group's procurement, sustainability, legal, governance, and risk processes. GN Group continues to review and update its policies and procedures to ensure appropriate and adequate protection against any mistreatment of people involved in its direct supply chain.
- c) This statement was approved by the Board of Directors, who is the principal governing body of GN Group and the reporting entity GN Hearing Australia Pty. Ltd. on 10 December 2025.



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