



## Consolidated ESG Statements

# Notes

### 11.6 Human Rights

Being a company committed to helping people regain hearing and improving their quality of life, acting responsibly is an essential part of our business culture. Consequently, we do everything in our power to fight human rights abuses, including modern slavery and human trafficking.

#### 1. Modern slavery

Our global manufacturing sites are in China, Denmark, Mexico, the Philippines, Poland and Singapore.

The risk of modern slavery in our operations is low due to the type of talents we bring into the company. Our thorough hiring procedures ensure no forms of forced or compulsory labor take place at our sites across all our sites.

Our suppliers are located in Europe, North America and Asia, and our due diligence program is designed to manage the risk of modern slavery in certain Asian regions where its risks are relatively higher.

#### 2. Governance

Human rights considerations are embedded into decision-making across our company and into our policy and governance framework. The Board of Directors is regularly informed on sustainability aspects of the business, including human rights, environmental and supply chain related risks, strategies and actions for addressing them at least twice a year. The Board of Directors delegates the responsibility of overseeing the management of risks related to environmental and corporate social responsibility practices, including those associated with our operations and supply chain to the Sustainability Committee. More specifically, the Sustainability Committee has oversight of all WSA's sustainability related programs. The Head of Sustainability leads and drives all sustainability related programs.

The Sustainability team has dedicated roles that works across the company to conduct human rights, environmental and supplier due diligence in our own operations and in our value chain and embed these considerations into everyday business activities.

#### 3. Policy

WS Audiology is committed to addressing human rights risks, including human trafficking and modern slavery by operating responsibly, safely, and with integrity. Our efforts are anchored in our policies, where we communicate our values and set our expectations for ourselves, our suppliers and partners. We

regularly review our policies to identify areas for improvement, a process which enables us to continually benchmark against evolving international human rights standards.

Our approach is guided by international protocols and procedures including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labor Organization Core Conventions. The Ten Principles of the United Nations Global Compact on human rights, labor, environment and anti-corruption form the basis of all our actions.

The WSA Code of Conduct and its associated policies, procedures, training and communication outline our expectations of all employees. The Code of Conduct, available in 15 languages demonstrates our commitment to complying with applicable laws, rules and regulations.

Our Human Rights policy, launched in FY22-23 demonstrates our commitment to respecting fundamental human rights and the dignity of people connected to our business around the world.

#### 4. Supplier due diligence

We updated and strengthened our Supplier Code of Conduct with the Responsible Standards for Suppliers (RSS) in FY22-23, in recognition of higher standards expected of us from our customers as well as to align with current best practice and standards. The RSS outlines our commitment to delivering high standards in both social and environmental matters, in our own operations as well as in relation to our suppliers and beyond. It defines WSA's requirements on our suppliers, concerning their compliance with applicable laws and responsibilities to respecting labor and human rights. Suppliers are required to sign the RSS as a prerequisite to starting a business relationship with WSA.

Our supplier due diligence program evaluates the qualifications and reputation of third parties, so that we work with those whose standards are compatible with our own. We identify suppliers who run a higher risk of having human rights, environmental and health and ethics issues in their operations and also their supply chains. In doing so, we cover our indirect suppliers in the due diligence process. Part of that process also includes having a dedicated team who collects conflict mineral reports from suppliers whose supply chain are prone to human rights abuses. We are conscious about materials and substances in our products and therefore commit to source materials responsibly including from conflict-free mines through our suppliers. We refuse to work with third parties that do not share our commitment to responsible sourcing.



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#### 11.6 Human Rights (cont'd)

The supplier due diligence program is a multi-step process conducted annually and is aimed at managing our supply chain risks. We first identify high risk suppliers based on country, category, spend and business relations. High risk suppliers identified are included in the year's audit plan where they will be audited against the whole scope of the WSA Supplier Code of Conduct (and the RSS from FY23-24) and include management system review, management interview, and workers interview. The audits are conducted by certified third-party auditors. The audit addresses the different facets of possible human rights abuses, including but not limited to topics such as modern slavery, human trafficking, forced labor and labor rights violations. It also addresses environmental, health and safety topics such as waste management and safe workplace. All non-compliances identified are monitored via a corrective action plan with appropriate timelines drawn up to ensure any violations are addressed within said time. Remedial actions and timelines are developed by suppliers and agreed upon by WSA, and closely followed-up by the appointed auditing firm. The Sustainability Committee is informed of the results of audit before the end of the FY.

Our procurement department and sustainability department co-owns the RSS and supplier due diligence program.

Further information including our supplier due diligence KPIs are detailed in note 13.1.

#### 5. Risk assessment and management

We assess the nature and extent of exposure to human rights risks in our business and supply chain and take a long-term and collaborative approach to mitigating the risks and tackling the root causes.

The salient human rights issues in our own operation and supply chain are identified based on a human rights assessment conducted by external human rights experts. It covers the full scope of WSA's global operations and value chain, from supply chain to sales, marketing, and distribution. The assessment is based on internal and external stakeholder interviews and documentation review.

The human rights assessment also defines each of the salient human rights issue and what that means to WSA. They are documented within the Human Rights Assessment report.

The respective issue owners continue to assess, monitor, and mitigate the risks associated with salient human rights issues in our own operation. We include vulnerable groups, such as pregnant women and colleagues with a disability in the risk assessment, where applicable.

Overview of salient human rights issues, scope, and issue owners:

Salient human rights issues	Own operation	Supply chain
Occupational Health, Safety and Security	X	X
Violence and Harassment	X	X
Non-Discrimination and Equal Opportunity	X	X
Freedom of Association and Collective Bargaining	X	X
Forced Labor	X	X
Working Conditions: Working Hours, Wages & Benefits	X	X
Young Workers and Child Labor	X	X
Grievance Mechanisms and Access to Remedy	X	X
Access to Healthcare and Right to Science	X	
Responsible Marketing and Sales	X	
Product Quality and Safety	X	
Sourcing from Conflict-Affected and High-Risk Areas		X

The salient human rights issues in our own operation are owned by relevant departments, such as EH&S, HR, Legal, Marketing, and Quality. The supply chain human rights issues are jointly owned by Procurement, Sustainability and Legal.

We are subject to regular social compliance audits from our customers.

We also assess our own human rights risks through regular internal audits. These audits are carried out by the Global EH&S Officer on our sites and covers both social and EH&S areas.

Health and safety incidents are directly reported to EH&S officers. All cases this year have been investigated and resolved, with preventive actions taken to mitigate risks. See note 11.5 for an example of mitigation actions of a health and safety incident.



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### 11.6 Human Rights (cont'd)

Part of our M&A process includes a human rights due diligence questionnaire. This constitutes our comprehensive risk assessment of potential acquisitions.

As reflected in our Code of Conduct, we recognize a range of operational and reputational risks in our supply chain, and we refrain from working with third parties that do not share our commitment to integrity. We conduct due diligence procedures to evaluate the qualifications and reputation of suppliers and avoid working with suppliers whose standards are incompatible with our Code.

Based on business risks, as well as country, product and service category, we identified and audited 5 high risk suppliers in FY22-23. The audit results showed that some suppliers have non-compliances related to working hours and safety management. We did not identify any non-compliances related to modern slavery. We follow up closely with all suppliers to rectify their non-compliances based on agreed timelines.

We continue to evaluate the risk of new suppliers and include them into our audit plan where they are deemed high-risk.

As outlined in the WSA Code of Conduct, we are committed to foster an environment where our employees can ask questions and raise issues and concerns about business ethics without fear of retaliation. Employees can raise issues and concerns to their managers, Local Compliance Advisor, Regional Compliance Officer and Human Resources department. Employees and third parties can raise issues and concerns anonymously to [tell-us@wsa.com](mailto:tell-us@wsa.com) and/or through the WSA Compliance Portal.

The WSA Compliance Portal is available in 15 languages. Reports in the WSA Compliance Portal are made through an externally hosted internet portal by an independent third party service provider. We follow up on reported violations with internal compliance investigations when justified by supporting evidence.

### 6. Mitigation and remediation

As part of our preventive measures, we continue to increase the awareness of modern slavery and human trafficking among our employees. The WSA Code of Conduct is provided to all new employees as part of their onboarding material. The RSS is developed in collaboration between the sustainability and procurement teams and communicated to the respective team members accordingly.

Our EH&S officers from key geographies including Europe and Asia were trained on human rights due diligence to support and enhance our internal audits on human rights topics across our operations. Beginning in 2024, human rights training program will be rolled out covering HR and local management teams across our high-risk sites.

Over the course of the year, we engaged our suppliers on a range of topics. We invited key suppliers to participate in our materiality assessment exercise and provided training on decarbonization. These were steps we took to include our suppliers in our sustainability story and support them on their ESG journeys.

We ensure compliance with national labor legislation, having open and honest relationships with employees, and respecting their right to be informed, heard, and to voice their concerns in an open and transparent manner.

The WSA Compliance Portal is a channel for all internal and external stakeholders to raise their concerns of human rights violations anonymously. Read more about the WSA Compliance Portal in note 13.2 Business ethics. Substantiated human rights related concerns are raised to HR via the WSA Compliance Portal. Both substantiated cases on harassment and bullying raised this year have been investigated and resolved. See note 11.2 for more details.

**WSA's policies, practices, and procedures to assess and address the risk of modern slavery apply to our operations and supply chains worldwide. This statement under note 11.6 Human Rights has been prepared in compliance with the requirements of the United Kingdom Modern Slavery Act and the German "Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains" (Lieferkettensorgfaltspflichtengesetz). It describes the actions taken by WSA during the period from October 1, 2022 to September 30, 2023.**