

Modern Slavery Statement FY2023/24

WS Audiology Modern Slavery Statement 2023/24

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 take a zero-tolerance approach against modern slavery and human trafficking.

This statement is published in accordance with the UK Modern Slavery Act 2015. It sets out the policies, procedures, and actions taken by WS Audiology in FY2023/24 to prevent, detect, and respond to the risk of modern slavery and human trafficking in all its forms.

Who we are

Our purpose is to unlock human potential by making wonderful sound part of everyone's life. We want all individuals to access the wonder of hearing by providing solutions to fight the global hearing challenge.

WS Audiology is one of the largest players in the hearing aid industry. We design and manufacture hearing aids that help millions of people reclaim and benefit from being able to hear again. We help improve people's health, well-being, and quality of life. Through our extensive network of managed care and diagnostics locations, we aim to increase the awareness of hearing challenges and the accessibility of professional care. Our global production sites are in China, Denmark, Mexico, the Philippines, Poland, United States and Singapore.

We are 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, and regularly review them to identify areas for improvement, a process which enables us to continually benchmark against evolving international human rights standards.

Our suppliers are in Europe, North America, and Asia. The risk of modern slavery in certain Asian regions is relatively higher. Our supplier due diligence program manages this risk and ensures unethical behavior does not occur anywhere throughout our entire supply chain.

Policy

WS Audiology is dedicated to addressing the risks of human trafficking and modern slavery by operating responsibly, safely, and with integrity. Our approach is aligned with international standards, including the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

We are guided by the Ten Principles of the United Nations Global Compact, which focus on human rights, labour, the environment, and anti-corruption, forming the foundation of all our actions.

The WSA Code of Conduct reflects our commitment to respecting human rights. We adhere strictly to all applicable laws, rules, and regulations, recognising that respecting human rights is a cornerstone of how we do business. We are conscious of the materials and substances used in our products and collaborate closely with our suppliers to ensure materials are sourced responsibly, WSA We refuse to engage with third parties that do not uphold our values of integrity and responsibility.

Whistleblowing

At WS Audiology, we are dedicated to maintaining a safe and transparent environment where concerns about modern slavery and ethical issues can be raised without fear of retaliation. Our whistleblowing system, supported by the WSA Compliance Portal, offers secure and confidential channels for employees and third parties to report misconduct anonymously.

The WSA Compliance Portal, available in 15 languages and independently hosted, ensures confidentiality and limits access to reports on a need-to-know basis. Employees receive mandatory training on ethical practices and reporting mechanisms through our eCampus system, with additional reporting options via managers, Compliance Advisors, and Human Resources.

All reported incidents are thoroughly investigated when supported by evidence, and outcomes, including findings and actions, are shared with the whistleblower and relevant stakeholders. Our system complies with Directive (EU) 2019/1937, protecting those who report breaches in good faith.

Supplier Due Diligence, Risk Assessment and Management

Respect for human rights across our supply chain is a core principle of WS Audiology's Supplier Due Diligence Program. This program, implemented by our Procurement and Sustainability teams, evaluates the qualifications and reputation of third parties to ensure we collaborate with partners who uphold standards compatible with our own.

Our due diligence process begins with establishing clear expectations. The Supplier Code of Conduct is shared with suppliers who enter into a business relationship with us. The Supplier Code of Conduct sets out our standards regarding respect for labour and human rights among other topics. The Supplier Code of Conduct is publicly available on our webpage. We conduct annual risk assessments to identify high-risk suppliers, using criteria such as geographic location, product category, and spend. Suppliers identified as high-risk undergo third-party audits to assess their compliance with our standards. These audits address key human rights risks, including Environmental, Health, and Safety (EHS) concerns. Where non-compliance is identified, suppliers must present corrective action plans with agreed timeframes. Remedies are deemed effective when they meet our criteria for mitigating risks and preventing recurrence. In cases of repeated or intentional non-compliance, we reserve the right to terminate the supplier relationship.

In FY2023/24, six suppliers were flagged for due diligence: two were audited against the WSA Supplier Code of Conduct, while the remaining four provided satisfactory audit reports based on Responsible Business Alliance (RBA) or Sedex SMETA standards, both of which align with our expectations.

Additionally, we expanded our due diligence to include battery suppliers in line with the EU Battery Regulations this year, which set strict requirements for the sourcing of sensitive minerals. Thus far, no significant human rights impacts have been identified in this area.

Training

The WSA Code of Conduct is provided to all new employees as part of the onboarding material.

We continue to develop our training around human rights topics. This year, we developed *Conundrum*, an interactive board game that explores human rights-related dilemmas employees may face in their daily work to support our overall human rights training within WSA. This tool encourages participants to apply theoretical knowledge to practical situations, deepening their understanding of human rights risks and how to manage them effectively.

The training program will expand to employees in non-production roles in high-risk regions, reinforcing our commitment to fostering a culture of respect for human rights throughout our operations and supply chain.

Scope

This statement refers to the financial year ending 30 September 2024. It is published by WS Audiology and covers all entities.

Signature

This statement was approved by WSA's Global Management Board

Signed on behalf of Global Management Board of WS Audiology.

Date: 23 December 2024



Jan Makela

Group CEO



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