

SUPPLIER CODE OF CONDUCT

GN STORE NORD A/S

May 2023





As a committed signatory to the UN Global Compact and its 10 principles of responsible business, we strive to uphold and protect human rights throughout our supply chain, ensure our labor practices meet international follow the highest standards in business ethics, and take responsibility for our environmental footprint.

All suppliers to all GN Group companies, including all subsidiaries and affiliates, are expected to operate in accordance with the minimum requirements set out in this code. In addition to the requirements in this code, more detailed standards are set out in several areas in our policies and contractual clauses. Failure to observe this code will require corrective action. Long-term non-compliance may be considered a material breach of the contract and may lead to termination.

We understand that ensuring standards are met at all times requires us to be in constant dialogue with our suppliers. We see this code as a tool in that process, giving our business partners a clear understanding of our standards and expectations. It is also a tool to encourage dialogue and collaboration towards a common understanding and approach.

Suppliers are required to adopt a similar code of conduct to ensure these requirements are adopted across GN's full value chain. Where there is conflict between the rules laid out in this Supplier Code of Conduct and local laws and regulations, the stricter of the two shall apply.

Audits and data sharing

Where specified in contracts, suppliers should allow audits to verify compliance with this code and other contractual obligations.

Upon request, suppliers are expected to share environmental, social and governance (ESG) data with GN, including:

- Completing self-assessment questionnaires related to ESG topics
- Sharing carbon emissions attributable to GN, ideally through product life-cycle assessments (LCA)
- Sharing waste, water and energy consumption attributable to GN

Labor conditions

Anyone who works directly or indirectly for GN is entitled to his or her basic human rights. GN's suppliers should be committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct worker, and any other type of worker.

Freely chosen employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company provided facilities including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment. Foreign migrant workers must receive the employment agreement prior to the worker departing from his



or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents. Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker, by the relevant service provider or employer.

Child labor

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all applicable local laws and regulations, is supported. Special consideration must be taken to ensure that work done by workers under the age of 18 respects their ability and does not pose any risk to their health or safety, this includes night shifts and overtime.

Wages and working hours

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

Workers should be granted stipulated annual leave; sick leave and maternity/paternity leave without any form of repercussions.

Humane treatment, non-discrimination and non-harassment

Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers, and appropriate grievance mechanisms must be available to .

Suppliers should be committed to a workplace free of harassment and unlawful discrimination, and shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.



Freedom of association

In conformance with local law, suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

Health and safety

At GN we believe that a safe and healthy work environment for all workers ensures stability and productivity. We expect all our suppliers to work toward implementing the international occupational health and safety management standard OHSAS 18000 or a similar framework for their health and safety work.

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

Occupational safety

Potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified, assessed and mitigated. This includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women and 'nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers.

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

Industrial hygiene

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards were identified, suppliers shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be



adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

Physically demanding work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

Machine safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers

First aid

First aid equipment must be available in a building, and at least one person in each department should 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 should cover the costs (not covered by social security) of medical care for injuries incurred on their premises.

Sanitation, food and housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the supplier, or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting and heating and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

Environment

Permits

All required environmental permits (e.g. discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

Pollution prevention

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means.

Hazardous substances and waste

Chemicals, waste, and other materials posing a hazard to humans, or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

Air emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting



substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

Water management

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

Carbon emissions and climate strategy

GN is committed to reducing its footprint in line with the scientific consensus on the urgency of addressing climate change. Given that the vast majority of our emissions take place in our supply chain (scope 3 emissions), we encourage our suppliers to set equally ambitious carbon reduction targets, have transition plans in place to achieve these targets and make carbon emissions data available to GN proactively through public disclosures and upon request, covering both corporate level emissions and product/component-level emissions attributable to GN through life-cycle assessments (LCAs).

Material use and circularity

Suppliers are to adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal.

GN is committed to supporting a shift to a circular economy through sustainable product development and management, by optimizing for sustainability in materials, repairability, durability, packaging, reuse and recycling, manufacturing, and distribution. Where relevant, suppliers are expected to support this transition

Business Ethics

In GN we do business in an ethical way. Our goal is to demonstrate the highest level of ethics and integrity in our business dealings. We expect from our suppliers that the highest standards of integrity are to be upheld in all business interactions.

Bribery and anti-corruption

Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

Protection of Identity and Non-Retaliation



Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

Privacy

Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and workers. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Conflict Minerals

GN does not want to use conflict minerals from conflict-affected or high-risk areas. See GN's Policy on Conflict Minerals for more detail.

Further information

To learn more about the GN Group and all its subsidiaries' relation to sustainability and supplier responsibility please visit <https://www.gn.com/About/Corporate-sustainability>

As always we welcome feedback. You are welcome to contact the GN Group with sustainability-related questions or comments on sustainability@gn.com for all other inquiries please contact your primary contact in GN, or compliance@gn.com.