

WE HELP THE WORLD LISTEN

CODE OF CONDUCT



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Message from the President & CEO

Dear Colleagues

The success of the Sonion Group is based on our joint efforts towards maintaining and developing a strong and competitive business with strong customer and partner relations. The foundation for our positive development would simply not exist without the daily support and dedication from all employees in the Sonion Group.

In order to carry on our good work and support our successful development, we need to always be aligned on how to conduct ourselves towards each other, our customers, our business partners, and the community where we work and live. Our integrity and ethical behaviour are crucial for our internal culture as well as for our reputation and the relationships we build with our customers and other business partners.

You are encouraged and expected to be familiar with our Code of Conduct. As a Sonion employee, you are responsible for supporting the ethical business conduct of the Sonion Group by applying and complying with these core principles and ethical standards in your work.

If you have concerns about ethical behaviour in Sonion, we expect you to speak up and raise your concern via the relevant channels, including the option to use our online Whistleblower reporting line.

One of our values is to be Responsible, and with this Code of Conduct, we underline that we are truly dedicated to being uncompromising in our ethics, accountability, and reliability.

Christian Nielsen

President & CEO



Our Vision, Mission and Values

Vision:

We help the world listen.

Mission:

We build open innovation partnerships helping people listen - to each other, to their bodies and to the world.

Values:

Future-focused. Supportive. Responsible. Driven. Responsive

Our Values and how we conduct our business are the foundation of all that we do in Sonion. Our Values help direct our behaviours and support our success:

Future-focused: We are visionary and ambitious.

Supportive: We are open-minded and supportive of our stakeholders.

Responsible: We are uncompromising in our ethics.

Driven: We are passionate and dedicated about our work.

Responsive: We are agile and flexible.



OUR CODE

Our commitment

Our values support the way we do business, and our Code of Conduct provides the ethical and behavioural framework and describes the minimum standards and principles that are applicable to all Sonion employees as well as to our contractors and suppliers performing work for the Sonion Group.

WE HELP THE WORLD LISTEN

sonion

Our code

All Sonion employees have a personal responsibility to:

- Understand our Values, our Code of Conduct, and the principles and behaviours that are expected of you and required for your job
- Ensure your behaviour is consistent with the standards set out in our Code of Conduct
- Comply with all applicable laws and regulations
- Complete all compliance training
- Seek guidance when you are unsure of the right thing to do
- Raise concern if you become aware of any suspected wrongdoing

If you manage people, you have the additional responsibility to:

- Create and foster a culture in which colleagues of your team feel able and confident to speak up on ethical issues
- Engage and follow through on questions and concerns in a timely and appropriate manner
- Be a role model, lead by example and display high levels of integrity at all times
- Make sure your team understands that business results are never more important than our integrity
- Make sure that relevant compliance training is provided to everyone in your team, and that they understand it.



Our code

How to use this Code of Conduct

This Code of Conduct provides a framework of guiding principles, but it is impossible to cover all situations that may arise in our day-to-day operations. You will also need to refer to the relevant internal policies or procedures for more detailed information and guidance.

Where to go for help

You are always expected to use your common sense and seek advice as appropriate. You can ask your Manager for guidance or contact the local Compliance Officer, HR department, or the Legal Department.



Our code

How to raise a concern

Speak up

In Sonion, we support and encourage open and honest communication. If you feel the need to discuss a work-related issue or concern, please do not hesitate to contact your immediate Manager or another Manager. If you think a concern will not be properly addressed within the hierarchy, you can approach your local HR department or the Compliance Officer. Any serious issues and breaches of this Code of Conduct, including legal, serious financial, or reputational risks, should be reported to your Local Managing Director or the Head of Compliance/General Counsel.

Whistleblower line

If you are not comfortable with this, or in case you have already taken action as described above, and you believe that the issue has not been handled correctly, you may report the issue to the Sonion Whistleblower Line in accordance with the Sonion Whistleblower Policy. You can access the Sonion Whistleblower Line here:

<https://report.whistleb.com/en/sonion>



Our code

Addressing concerns and non-retaliation

It is important for us that all Sonion employees feel that they can speak up and come to the management with a concern without the fear of retaliation.

We will address and take seriously all concerns raised in good faith. Good faith means providing all information regarding a concern and believing it to be true.

We will investigate any reported matter and where a violation has occurred and take corrective action to resolve the situation.

In Sonion, we will not tolerate harassment, vengeful actions, or other types of sanctions against any person who, in good faith, files a report or who assists Sonion in connection with the processing and investigation of a case.

There will be no acts of retaliation taken against any employee who reports, in good faith, a violation or who assists Sonion with the investigation of a case. Corrective action will be taken against anyone found to have retaliated against another person, regardless of position.





OUR BUSINESS CONDUCT AND PRACTICES

Our customers are the foundation for our business, and we put our customers first. We treat our customers, suppliers, and other business partners with respect, dignity, fairness, and courtesy.

We expect our employees to act with professionalism and not jeopardize the integrity of our customers, suppliers, and other business partners. We are committed to complying with all applicable laws, rules, and regulations.

Our Business Conduct and Practices

Anti-Corruption

We conduct our business honestly and rely on the merits of our product and our employees. We do not accept any form of direct or indirect corruption or bribery. It is strictly forbidden to make improper payments (bribes, gifts, kick-backs, or other payments for illegal purposes) to government employees or officials, customers, or others. This applies to direct payments but also to indirect payments made through third parties. We ensure that gifts, hospitality, and entertainment do not unlawfully influence decision making. We expect the same ethical behaviour from any business partner that we work with or that work on our behalf.

Fair Competition

We support fair and unrestricted competition and comply with all competition and anti-trust laws. We act with independence in all commercial decisions and win business by having the best products and performance. We will never seek to collaborate or co-ordinate with our competitors, suppliers or customers in a way that could result in a restriction of competition. We will never participate in illegal price co-ordination, bid rigging or restrictive market sharing. We do not use our market position to discriminate against others through unfair business practices.



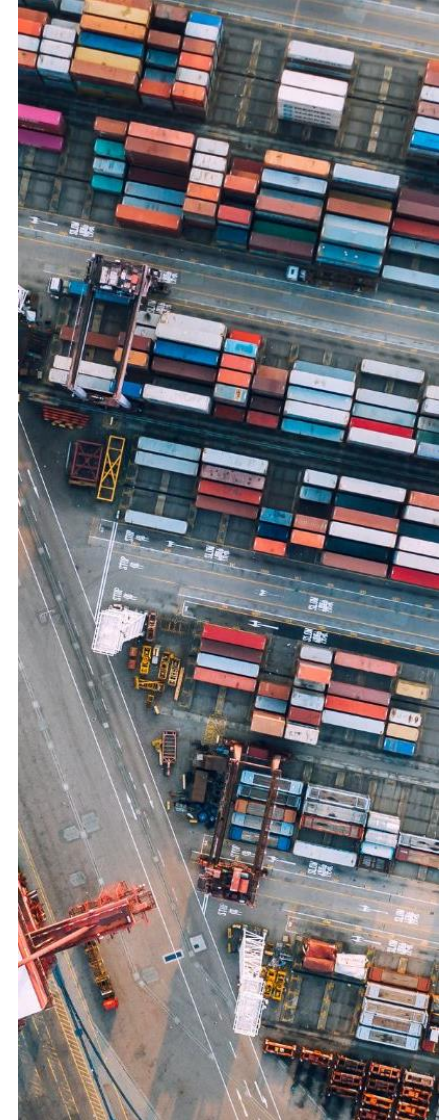
Our Business Conduct and Practices

Trade Compliance and Export Controls

We comply with all applicable export control, sanctions, customs laws, and regulations. Our products are exported globally and depending on the destination and nature or application of our products, the export may be subject to export controls or trade sanctions. We will ensure that controls, policies, and procedures are in place to support the lawful export of our products.

Environment

We comply with all environmental standards, laws, and regulations that apply to our business and locations. We continuously strive to minimize the impact of our activities on the environment in which we operate. We are focused on acting sustainably and decreasing our daily energy and water consumption and as well as reducing and recycling the waste we generate. We are determined to reduce our environmental footprint by contributing to the UN Sustainable Development Goals (UN SDGs), and we will report on an annual basis on how we contribute to the UN SDGs, supporting a better and more sustainable future for all.



Our Business Conduct and Practices

Product Quality & Safety

Our customers are the foundation of our business, and they demand high-quality and safe products. We strive to provide innovative technology and high-quality products and services that, throughout their life cycle, meet our customers and our own quality standards. We always operate in a manner that safeguards the quality and safety of our products and services. We are conscious of the materials and substances in our products. We work closely with our suppliers to source materials responsibly.

Data Privacy

We respect data privacy and protect the personal data that we need to collect from employees, customers, business partners, and other stakeholders. We comply with all applicable data protection laws and regulations and only process personal data for business purposes. We are committed to protecting personal data through security measures and responsible policies.



FAIR TREATMENT OF EMPLOYEES – WORKING CULTURE & EMPLOYMENT PRACTICES

We continually aim to create a respectful working culture that is genuinely open and inclusive with respect to our communication, our internal collaborations, and our general approach to people and our daily work.

We believe that the best solutions come from working together with colleagues, customers, and external partners. We take pride in the diversity of our workforce and view it as a competitive advantage to be nurtured and expanded.



Fair Treatment of Employees – Working Culture & Employment Practices

Working culture

Effective teamwork requires relationships, respect, and sharing. Our employees are offered the opportunity to develop the competencies that are necessary to achieve the expected results. We also support a balance between work and private life.

Health and Safety

We provide a healthy and safe workplace. We set and expect a high standard for protecting the health, safety, and well-being of our employees and others. Health and safety are an integral part of all our activities, and we strive to identify and mitigate health and safety risks in all our operations and on all our sites.



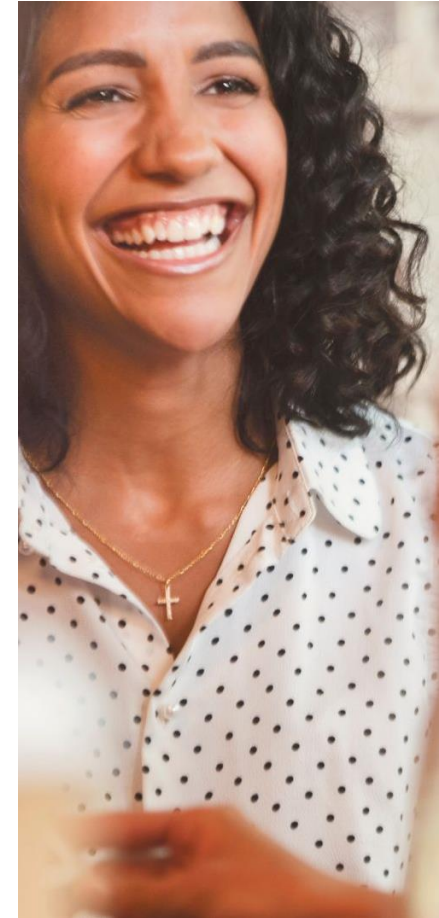
Fair Treatment of Employees – Working Culture & Employment Practices

Diversity and Inclusion

Sonion is a global and international organization, and we recognize the value of a diverse work force that brings varied experiences, ideas, and innovation to the workplace. We strive to be an inclusive workplace that equally evaluates all candidates for available positions. We do not discriminate on the basis of race, color, sex, religion, political opinion, national extraction, sexual orientation, or social origin. Employees are only selected on the basis of their competencies, skills, and overall ability to do the job at hand.

Human Rights and Modern Slavery

We strive to conduct all our activities in a way that respects the human rights and dignity of people, as set out in the United Nations Bill of Rights and the core conventions of the International Labor Organization. We recognize and respect the employees' rights to freedom of association and collective bargaining and acknowledge collective bargaining as a tool enabling democracy and engagement within the organization. We are committed to preventing modern slavery and do not accept the use of forced or compulsory labor and child labor, and we work to ensure that our supply chain shares the same commitment.



Fair Treatment of Employees – Working Culture & Employment Practices

Conflicts of Interest

We expect all business decisions to be made in the best interest of Sonion. We avoid conflicts of interest in our business dealings. A conflict of interest occurs when your private interests interfere or appear to interfere in any way with the interests of Sonion. We avoid any relationship, influence, or activity that may make it difficult to perform our work and make objective decisions. A conflict of interest can arise if Sonion employees or their family members have interests in or work directly or indirectly for a customer, supplier, or competitor. All conflicts of interest or potential conflicts of interest must be disclosed.



PROTECTING OUR ASSETS AND FINANCIAL INTEGRITY

Our assets enable us to operate safely and efficiently and grow our business. Trust in our business is dependent on the certainty of our financial conduct, published information, and internal controls.

Protecting our Assets and Financial Integrity

Accuracy and Integrity of Business Records

We maintain accurate and complete records of all our business dealings. We ensure that economic and commercial decisions are based on accurate financial data. We follow all applicable laws and professional standards that apply to our business dealings. We maintain accurate and complete records of our financial transactions in accordance with our policies, internal control systems, and applicable professional standards. We are committed to having the necessary control and systems in place to prevent and detect fraud.

Use and Safeguarding our company assets

Our technologies, intellectual property, commercially sensitive information, and financial and physical assets are vital to our business, and we protect them from unauthorized use and disclosure. We expect our employees to act appropriately to protect company assets and only use them for business purposes.



Protecting our Assets and Financial Integrity

Intellectual Property and Confidential Information

We respect intellectual property rights and protect confidential information, and we expect others to respect our intellectual property rights. The innovations and intellectual property that we create and hold are our vital assets, and we protect them from unauthorized use and disclosure. We will not disclose any confidential information unless we are authorized to do so or as required by law.

Information Security

We are committed to protecting all information, systems, applications, networks, and devices across our business and locations from external threats that are trying to exploit any weaknesses in our physical or digital security. We do not tolerate any inappropriate use of information and the use of our business systems to access, store, or transmit anything considered to be offensive, obscene, or inappropriate. We expect our employees to protect the information in their care and follow all applicable procedures.





**THANK YOU
FOR
LISTENING**

Email:

sonion@sonion.com

Sonion Whistleblower Line:

<https://report.whistleb.com/en/sonion>

Phone numbers:

Denmark	+45 4630 6666
Netherlands	+31 20 6068 100
Philippines	+63 43 430 8888
Vietnam	+84 28 3736 2222