



## Sonova Modern Slavery Statement 2024/2025

### 1. The reporting entities

As a leading provider of hearing care solutions across the world, Sonova Group ("Sonova") recognizes its responsibility to cease, prevent, and mitigate modern slavery and human trafficking risks and is committed to enhancing its efforts to combat modern slavery and human trafficking across its value chain.

This statement is made in accordance with the UK Modern Slavery Act 2015 and Australia's Modern Slavery Act 2018 (see Appendix I for comparison table) and covers Sonova's financial year 2024/2025, i.e., from April 1<sup>st</sup>, 2024 to March 31<sup>st</sup>, 2025.

This statement is a joint statement made on behalf of the Sonova entities reporting:

- In the UK: Boots Hearingcare Limited (company number 00823009), as well as Sonova UK Limited (company number 03417253), including DHCS Newco Limited (company number 14009321) and Digital Hearing Care Solutions Limited (company number 05659065) as subsidiaries all carrying on a business in the UK and part of the consolidated turnover.
- In Australia: Sonova Audiological Care Australia (ABN 93113235779), Neurosensory Pty (ABN 21060595155), and Southern Hearing Investments Pty Ltd (ABN 91118110222), with consolidated revenues.

The Sonova entities mentioned above issue the present joint statement because they are bound by the same Sonova policies and processes, operate in the same sector and are part of the same internal value chain. This statement consists in a consolidated description of their actions to address modern slavery risks, and was drafted in collaboration with the covered entities. Unless stated otherwise, references to "we", and "our" refer to Sonova, the above mentioned entities and their owned and controlled entities.

### 2. Structure, business, and supply chains

Sonova is a global leader in innovative hearing care solutions: from personal audio devices and wireless communication systems to audiological care services, hearing aids and cochlear implants. The Sonova Group was founded in 1947 and is headquartered in Stäfa, Switzerland.

Sonova operates through four Business Units – Hearing Instruments, Audiological Care, Consumer Hearing and Cochlear Implants – and the core brands Phonak, Unitron, AudioNova, Connect Hearing, Sennheiser, and Advanced Bionics, as well as regional brands. The Group's globally diversified sales and distribution channels serve an ever-growing consumer base in more than 100 countries. In the 2024/2025 financial year, the Group generated sales of over CHF 3.8 billion, with an adjusted Group operating profit (EBITA) of over CHF 807 million. Around 18,000 employees work on achieving Sonova's vision.

Sonova manufactures hearing aids, cochlear implants, and consumer hearing devices. Over 90% of Sonova's hearing instruments are produced in the Asia/Pacific region at its operations centres in Vietnam and China. In February 2024, Sonova opened a new operations centre in Mexicali, Mexico for manufacturing of both hearing instruments and cochlear implants. Sonova is committed to delivering high quality products to its customers and consumers, and to do so, responsible sourcing and manufacturing is crucial.

Our tier 1 suppliers are mainly high-tech design and component makers, or original equipment manufacturers with a high degree of automation. In 2024/25, Sonova sourced direct materials from 933 suppliers across the different Business Units. Sonova also sources a variety of services, such as IT services, advertisement, management, and consulting.

Sonova UK Limited (including DHCS Newco Limited and Digital Hearing Care Solutions Limited) is part of Sonova's Hearing Instrument Business Unit and offers hearing aid products, accessories, and repair

services in the UK market under the brand Phonak. Sonova UK Limited is part of the Sonova Group and owned by Sonova Holding AG based in Switzerland. As the UK wholesale branch, Sonova UK Limited takes part in Sonova's UK organization for wholesale and the Board of Directors and Managing Director of Sonova UK Limited are based in Warrington, UK.

Boots Hearingcare Limited is part of Sonova's Audiological Care Business Unit and is a healthcare retailer in the UK, dispensing hearing aids to customers, produced by Sonova's manufacturers. Boots Hearingcare Limited is part of the Sonova Group and majority-owned by Sonova Holding AG. The Board of Directors and Managing Director of Boots Hearingcare Limited are based in Stäfa in Switzerland, Rotterdam in the Netherlands, and in Nottingham and Conwy in the UK.

The Sonova entities reporting under the Australian Act are also part of Sonova's Audiological Care Business Unit. Sonova Audiological Care Australia, and its subsidiary Southern Hearing Investments Pty Ltd, operates under the brand Connect Hearing and employs 442 workers within its 105 audiology clinics. Connect Hearing is a national network of healthcare hearing centres across Australia backed by a telehealth team. The brand's mission is to make it easier for people to proactively manage their hearing health, delivering customised and technological care. Neurosensory Pty, also a subsidiary of Sonova Audiological Care Australia, operates under its own brand Neurosensory and employs 94 workers within 25 audiology clinics across the east coast of Australia. Neurosensory delivers hearing tests for all ages, hearing aids and accessories, cochlear implants, bone-anchored implants and acoustic implants, vestibular assessments and rehabilitation, and tinnitus assessments and management options. Neurosensory joined Sonova Audiological Care in December 2021. The Board of Directors and Managing Director of Sonova Audiological Care Australia and Neurosensory Pty are based in the North Sydney area and Norwest, New South Wales.

Due to the organization of the Group and the role of the reporting entities, this report focuses on Group commitments, procedures, and activities related to human rights due diligence, and includes information specific for the reporting entities where relevant.

Additional information on Sonova's work may be found on Sonova's ESG Report 2024/2025 on [www.sonova.com](http://www.sonova.com).

### **3. Human Rights Due Diligence process**

Sonova is committed to aligning its Human Rights Due Diligence ("HRDD") process with the United Nations Guiding Principles on Business and Human Rights ("UNGPs"), throughout our business, proactively identifying, assessing, preventing, and mitigating actual and potential adverse human rights impacts on potentially affected rightsholders across our value chain. To drive such a process effectively, we set up a human rights roadmap. The implementation of this roadmap is tracked based on appropriate qualitative and quantitative indicators and feedback from relevant internal and external stakeholders. This monitoring is used to inform and support continuous improvement and to ensure the effectiveness of Sonova's HRDD framework. Where possible, Sonova strives to measure the impacts of its actions on the human rights of potentially affected people. Sonova communicates transparently about its actual and potential impacts and how it deals with them. It also reports on the progress and further actions of the HRDD framework at least annually in its publicly available ESG Report.

Sonova and all the legal entities of the Group, including the reporting entities, are committed to maintaining high standards of business ethics and integrity in accordance with the law, as well as with recognized human rights and labour standards as outlined in international human rights frameworks. More specifically, they are committed to international standards in relation to modern slavery and trafficking including the following:

- Universal Declaration of Human Rights (UDHR)
- United Nations International Covenant on Civil and Political Rights
- United Nations International Covenant on Economic, Social and Cultural Rights
- International Labour Organization (ILO) - Core Labour Conventions

- UNGP
- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance for Responsible Business Conduct
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas
- UNICEF's Children's Rights and Business Principles (CRBP)
- ISO 45001 Occupational Health and Safety Management (OHS) Standard
- ILO-IOE Child Labour Guidance Tool for Business

On this basis, a risk-based HRDD process was established for the Sonova Group and its companies such as the reporting entities. It encompasses modern slavery internally and on the supply chain to assess and address the risks through the following pillars: policies, identifying and assessing risks, training, social audits, and the grievance mechanism.

### **3.1. Policies**

Sonova is committed to identifying and addressing risks of modern slavery and trafficking in its supply chains or in any part of its own operations. Corresponding procedures and policies have been and continue to be developed and are endorsed and signed off by members of Sonova's Management Board and/or Board of Directors. On a regular basis, the management in the organization checks compliance with policies, and internal audits are carried out.

Sonova's **Code of Conduct** (<https://www.sonova.com/en/code-of-conduct>) defines general principles for ethical behaviour and applies to all employees of the Sonova Group, its subsidiaries, and any third parties such as distributors or suppliers while they are performing work for Sonova. An acknowledgment of the Code of Conduct is part of every new employment and third-party contract. The Code of Conduct is approved by the Board of Directors, is reviewed regularly, revised when necessary, and governs all relevant aspects of Sonova's business operations. It covers compliance with laws and regulations, conflicts of interest, anti-competition and Sonova's commitment to social and environmental responsibility such as human rights and addresses the prohibition of forced, compulsory and child labour, as well as human trafficking. The Code of Conduct is available in 18 languages and was last updated in 2019/20. Sonova is working on revising the Code of Conduct to align with new regulations and associated standards.

The **Human Rights Policy** ([https://report.sonova.com/2023/app/uploads/Human-Rights-Policy\\_2022\\_FINAL\\_English.pdf](https://report.sonova.com/2023/app/uploads/Human-Rights-Policy_2022_FINAL_English.pdf)) was established in December 2022 and provides a common foundation for Sonova's responsibility to respect human rights, and supports the key elements of the HRDD framework through: performing periodic human rights risk assessments along the value chain; conducting enhanced due diligence through impact assessments in high risk areas; and providing channels for reporting grievances and seeking remedy for violations – all using a risk based approach. The policy further outlines the key human rights risks ("salient issues") identified by Sonova within its value chain such as modern slavery. The Human Rights Policy is also available in 18 languages to ensure accessibility.

Moreover, Sonova has established its **SpeakUp policy** in April 2023 to encourage employees to report via the grievance mechanism any potential violations of the above-mentioned policies including potential cases of modern slavery.

To ensure equivalence of standards within its upstream value chain, Sonova released in September 2024 its new **Supplier Code of Conduct** ("SCoC", available at <https://www.sonova.com/sites/default/files/2024-08/Sonova%20Supplier%20Code%20of%20Conduct%20-%20September%202024.pdf>). This document replaced the previously applicable Sonova Group Supplier Principles and further strengthens the Group's human rights commitments throughout its value chain and sets clear expectations for suppliers to prevent the use of child labour and forced labour, among other topics. The SCoC and the **General Terms and Conditions of Purchase** (available at [https://www.sonova.com/sites/default/files/2024-09/20240901\\_General%20Conditions%20of%20Purchase\\_Sonova\\_September\\_New.pdf](https://www.sonova.com/sites/default/files/2024-09/20240901_General%20Conditions%20of%20Purchase_Sonova_September_New.pdf)) are incorporated into development and supply agreements. All suppliers must certify in written form that they will comply with these standards and principles in all of their Sonova-related dealings, activities, products.

For accessibility purposes, the SCoC is provided in several languages and Sonova is working to expand the range of available languages, according to the geography of the supplier base.

### **3.2. Identifying and assessing risks of modern slavery**

Modern slavery is an umbrella term that describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Types of modern slavery include trafficking in persons, slavery, servitude, forced labour, debt bondage, deceptive recruiting for labour or services, exploitative child labour and the worst forms of child labour (as defined in Article 3 of the ILO Convention No. 182).

#### **3.2.1.Risk assessment: process**

At Sonova, risks are mostly identified and assessed at Group level through regular Human Rights Risk Assessments ("HRRA").

All human rights issues are treated with equal rigor, but Sonova's HRRA assigns priority to those rights that could be most salient to its business. Sonova prioritizes human rights issues based on their scale, scope, and remediability, and recognizes that negative impacts on human rights may be particularly severe for some people due to their vulnerability or marginalization. The severity of impacts can evolve over time; human rights risks are therefore regularly reevaluated through stakeholder dialog and assessments. In November 2022 Sonova conducted its second high-level HRRA, building on the first from 2020. It was led by a cross-functional working group, supported by external business and human rights experts. The assessment covered the global value chain and ranked potential human rights issues based on the severity of the risk to potentially affected people. The assessment methods included desk research and internal workshops along with a reassessment of the salient human rights issues including modern slavery and forced labour. The overall list of salient issues remained as such, despite the enlargement of the business and an unsettled geopolitical environment. A new human rights risk registry was however instituted in 2023 and includes detailed information on the severity of each issue (based on scale, scope, and remediability), its likelihood of occurrence, and Sonova's ability to influence it. This is a useful internal tool to systematically address and monitor risk-based measures to prevent or mitigate risks of modern slavery. Human rights risks are also regularly assessed on an *ad-hoc* basis internally in the development of our different Compliance projects or processes.

In mapping risks for Sonova's own operations and supply chain, Sonova considered how it could directly cause or contribute to modern slavery and forced labour or be directly linked to it through the actions of a third party in its supply chain. For this, the first step was to adopt a holistic approach and observe other potential impacts, focusing on country and industry risks.

#### **3.2.2.Risk assessment: findings**

Sonova identified modern slavery and forced labour as a salient issue for the Group and determined it could be linked to a wide range of interrelated human rights issues such as: the right to enjoy just and favourable conditions of work, the right to social security, the right to freedom of association, the right to health, the right to life, the right to freedom of movement, the right to adequate housing, the right to freedom from cruel, inhuman and degrading treatment, the right to safe and clean drinking water and sanitation, the right to privacy, or the rights of minorities for instance.

Sonova's HRRA allowed to rate modern slavery and forced labour as high priority, with a medium level of likelihood, and a low leverage possibility. The research also revealed the following potential modern slavery and forced labour risks within the global supply chain:

- Raw materials extraction: Besides the pure geographical aspect (conflict/high-risk areas), extractive activities are labour-intensive and, therefore, employ a significant number of low-skilled workers (often migrants) that are more likely to be victims of modern slavery.
- Components manufacturing: Risk of forced labour that is particularly present in component-producing countries, especially China, Vietnam and RDC.

- **End of life:** Waste management (in particular, e-waste) is a labour-intensive sector often performed in the informal economy by poor and marginalized workers (i.e. migrants, urban poor, children). These categories of workers are far more likely to be forced to work. In general, human trafficking and modern slavery have been reported, both in formal and informal disposal/recycling facilities, including document detention, endless working days, violence and coercion by intermediaries.
- **Transportation & Logistics:** Low-skilled workers, often recruited through external labour providers. Long and complex supply chains, like Sonova's one, are difficult to monitor and may hide undetected forced labour, especially in countries with low labour standards, on cargo vessels, in the informal economy, or in migrant-receiving countries. Irregular practices suggestive of forced labour that have been reported in this sector are: excessive recruitment fees, lack of formal contracts, restrictions to workers' freedom of movement, debt bondage, cash deposit and document confiscation.

Human rights violations, such as forced or child labour, are more likely to occur during the extraction and sourcing of raw materials. As Sonova does not directly engage in these activities, the risk of modern slavery is considered to be higher within the upstream value chain than in Sonova's own operations. These risks are addressed through robust and responsible supply chain management (see following section).

In contrast, risks associated with component manufacturing, transportation, and logistics managed by Sonova-owned facilities are actively minimized. This is achieved through the application of the highest standards, along with social audits and compliance reviews.

### **3.2.3. Business Partner Due Diligence**

In parallel to the above, Sonova has implemented a Business Partner Due Diligence (“BPDD”) process to ensure that risks related to sanctions, corruption, and human rights are minimized both at the upstream (suppliers) and downstream (distributors) levels of the value chain. This is a mandatory process which depends on an internal policy applicable to all employees wishing to onboard business partners and is performed through a third-party platform. The due diligence screenings which are conducted on business partners include sanctions, watch lists, political exposure, and adverse media sweeps which allows to uncover potential human rights risks such as forced labour or child labour.

In December 2024, Sonova has revised its due diligence process for its upstream business partners to align with new regulations and strengthen its due diligence across the group. All direct suppliers, i.e., from which the supplies are present in the product we sell, and indirect suppliers on a risk-based approach, go through mandatory due diligence. This updated process allowed to identify and map out suppliers and ensure all relevant entities go through our BPDD process. At the global level as of the end of financial year 2024/25, 1360 suppliers were onboarded to this new platform, on a risk-based approach. A specific human rights risk assessment covering major human rights issues such as forced labour, child labour, and decent wages is also performed as part of this process. As per the BPDD process, any potential suppliers with high forced labour or child labour risks or impacts are declined at the vetting step, and risks detected through ongoing monitoring are remediated.

### **3.3. Training**

Sonova has implemented since 2022 an annual online training on the Group's Code of Conduct which is mandatory for all employees, including those of the reporting entities. The training was developed by an external company in close collaboration with Sonova and contains interactive modules and questions to ensure the topics are well understood. It notably focuses on promoting ethical behaviour and preventing discrimination and employees are required to acknowledge and abide by the Human Rights Policy as well as the SpeakUp policy which contain the prevention of forced and child labour.

The 2024/2025 session of the Code of Conduct training also focused particularly on modern slavery. Employees were informed about the warning signs of human rights and modern slavery violations in the supply chain to identify and prevent such cases from occurring.

The Code of Conduct training is usually completed by all employees in a timely manner. For instance, in 2024/25, the reporting entities reached 100% of completion rate for this training, including 99% within the allotted time.

Employees who are involved in procurement activity and responsible for supplier due diligence also follow a specific training on how to conduct due diligence which includes human rights due diligence and modern slavery topics.

### **3.4. Audits of our own operations and on supplier**

The Sonova Group conducts yearly social audits of its activities covering modern slavery and trafficking through child labour and forced labour modules notably. During Financial Year 2024/25, the social audit was conducted at Sonova's operations center in Mexico. This on-site social audit was performed by independent third-party auditors and was based on Sonova's policies, international standards, and local regulations. The audit included onsite confidential interviews with employees, document/record review, physical observations, and management interviews. The findings are included in a corrective action plan ("CAP") which is signed by the relevant responsible management representatives. The CAP contains remediation measures and is monitored centrally. None of the findings identified by the auditors were rated as critical and the facility received an A rating (100%) in the areas of Forced Labour and Child Labour. Key lessons from these audits are used to improve Sonova's approach to HRDD at Group level.

As for suppliers, remote audits are conducted with a risk-based approach to ensure they abide by Sonova's principles notably with regards to policies and actions on forced and child labour. This monitoring of suppliers through an ESG platform, Ecovadis, allows for the implementation of CAPs which cover forced and child labour topics if needed. Moreover, as per our BPDD process, suppliers undergo ongoing monitoring via another third-party platform which allows to uncover any forced or child labour impacts.

### **3.5. Grievance & Remediation Procedures**

The reporting entities have access to SpeakUp (<https://www.sonova.com/en/code-of-conduct>), a whistleblowing and compliance platform which serves as a grievance mechanism for all employees and other stakeholders including suppliers, and enables the identification of potential cases of modern slavery.

Sonova strongly encourages every employee, contractor or other stakeholder who knows of or suspects a violation of applicable laws, regulations, the Code of Conduct, or the Human Rights Policy, to report it through the SpeakUp platform. The SpeakUp policy issued in April 2023 is included in the annual Code of Conduct training for all employees to ensure wide acknowledgement. The SpeakUp platform is operated by an independent third-party provider and safeguards the anonymity of the reporter. Employees may report a concern to their line manager, their local HR function, a compliance manager, or directly via the SpeakUp platform. Employees, third parties or other external business partners can report a concern either by phone or via a secure website. Relevant phone numbers and websites are listed within the Code of Conduct, on the Sonova employee intranet as well as on the SpeakUp platform webpage. Sonova has a defined escalation process to handle and report SpeakUp complaints. The complaints are classified according to their impact (global/local) and/or the implicated person. The escalation process includes the handling of local matters by local management under the guidance and oversight of the Global Compliance team. All matters with global impact (both in severity and/or where senior members of management are implicated) are investigated by the Global Compliance team which reports directly to the Board of Directors and the Audit Committee. Sonova's SpeakUp platform and process are compliant with the EU Whistleblower directive and have been audited and verified by external auditors.

Sonova does not tolerate any form of retaliatory action against any employee who, in good faith, reports suspected wrongdoing, or complains about violations of the Code of Conduct or other internal policies. SpeakUp statistics are published on Sonova's internal platforms to increase trust and assure employees that their concerns are addressed in a timely manner. The Audit Committee of the Board of Directors is informed quarterly about concerns received through the SpeakUp process, the number and types of cases,

and the measures taken. Regular training programs on the SpeakUp process reinforce the importance of reporting violations, along with the process and channels for doing so.

During financial year 2024/2025, no cases of modern slavery or trafficking were reported to our compliance hotline in relation to the reporting entities or to Sonova as a group.

#### **4. Assessing the effectiveness of our actions**

Sonova and the reporting entities regularly assess the effectiveness of their actions to prevent modern slavery. To begin with, the policies related to modern slavery and trafficking, namely the Code of Conduct, the Human Rights Policy, and the SpeakUp policy are reviewed regularly to ensure they are up to date. Moreover, the effectiveness of human rights actions is also measured by way of regularly reviewing the risk registry together with the corresponding follow-up actions, by measuring the completion rate for the Code of Conduct trainings, as well as by monitoring the use of the independently operated compliance hotline SpeakUp. Indicators for the latter include total number of cases by topic and number of substantiated cases with follow up action. Furthermore, findings from social audits conducted by third-party/independent auditors are addressed through concrete actions.

#### **5. Consultation and Acknowledgement**

The present statement was drafted based on consultation of the relevant local functions and responsible parties for each of the covered entities. This included relevant human resources, procurement, finance, and management employees.

This statement was approved by the Boards of Directors of each reporting entities, i.e., Sonova UK Limited (including DHCS Newco Limited and Digital Hearing Care Solutions Limited), Boots Hearingcare Limited, Sonova Audiological Care Australia, Neurosensory Pty Ltd, and Southern Hearing Investments Pty Ltd.

Karen Gallagher

**Managing Director, and Board of  
Directors member  
Sonova UK Limited**

**Date:** 19-Sep-2025 | 13:28 BST

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Abaid Raza

**Group Finance Director, and Board of  
Directors member  
Sonova UK Limited**

**Date:** 17-Sep-2025 | 16:22 BST

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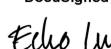
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**Managing Director  
Boots Hearingcare Limited**

**Date:** 17-Sep-2025 | 18:17 CEST

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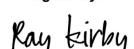
Ray Kirby

**Finance Director, and Company Secretary  
Boots Hearingcare Limited**

**Date:** 18-Sep-2025 | 15:28 CEST

**Signature:**

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Matthew Pitt	Piushi Singh
<b>Managing Director, and Board of Directors member</b>	<b>Finance Director, and Board of Directors member</b>
<b>Sonova Audiological Care Australia, Neurosensory Pty Ltd, and Southern Hearing Investments Pty Ltd</b>	<b>Sonova Audiological Care Australia, Neurosensory Pty Ltd, and Southern Hearing Investments Pty Ltd</b>
<b>Date:</b> 18-Sep-2025   02:55 CEST	<b>Date:</b> 18-Sep-2025   02:23 CEST
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#### Appendix I: Modern Slavery Acts Comparison table

UK Modern Slavery Act 2015 requirement	Australia Modern Slavery Act 2018 requirement	Reference in the statement
Organization structure, business, and supply chains.	Identify the reporting entity and describe its structure, operations and supply chains.	Sections 1 and 2.
Policies in relation to slavery and human trafficking		Section 3.1.
Due diligence processes in business and supply chain	Due Diligence	Section 3.
Slavery and human trafficking risk identification and the steps taken to assess and manage that risk	Describe the risks of modern slavery practices in the operations and supply chains. Describe the actions taken to assess and address these risks, including due diligence and remediation processes.	Sections 3.2, 3.4, and 3.5.
Effectiveness of steps taken	Describe assessment of the effectiveness of actions being taken to assess and address modern slavery risks	Section 4.
Training on modern slavery and trafficking		Section 3.3.
	Describe the process of consultation with any entities the reporting entity owns or controls	Section 5.