



Supplier Code of Conduct

Our Supplier Code of Conduct

As a creator of audio electronics, we have a responsibility to take care of our planet and the people involved in making our products. But we can't do this alone. We need to work with all our suppliers to keep raising our social, environmental and ethical performance together. We have created this Supplier Code of Conduct to help explain the minimum requirements we expect our suppliers to fulfil.

The Supplier Code of Conduct is based on a number of international declarations, conventions and guidelines such as the United Nations (UN) Global Compact, UN Universal Declaration of Human Rights and conventions of International Labour Organisations, as well as internal standards and values.

We acknowledge the complexity of the audio electronics supply chain, but we are committed to do our part and collaborate with our suppliers to make our business more sustainable together.

Jeremy de Maillard, CEO



Commitment and scope

Business relationships between Zound Industries International AB (hereinafter “Zound Industries”) and our suppliers should be based on cooperation, honesty and transparency. Zound Industries has created the Zound Industries’ Supplier Code of Conduct (hereinafter the “Supplier Code”) to clarify our supplier sustainability requirements that we expect our suppliers to fulfil. By signing the Supplier Code, the undersigned (hereinafter the “Supplier”) commits to comply with laws and regulations and to work proactively to meet the requirements in the Supplier Code. In cases where there are differences between applicable laws or regulations and the Supplier Code, the stricter standard shall prevail. In case of conflict between requirements in the Supplier Code and applicable law, the Supplier shall contact Zound Industries for consultation.

The Supplier is responsible for ensuring that its subsidiaries, partners, suppliers and subcontractors comply with the content of the Supplier Code including all permanent, temporary and agency employees and any other individuals directly or indirectly performing work (hereinafter “employees”). The Supplier shall report existing and/or suspected violations of applicable laws, regulations and the Supplier Code to Zound Industries to: sustainability@zoundindustries.com

Zound Industries treats all business and personal information received as confidential but reserves the right to share results from assessments and audits with its licensors and their respective auditors when factories, operations and businesses related to their licenced rights and purchased products are concerned.

Persistent failure to comply with the Supplier Code, giving false or misleading information or unjustified refusal of providing information may result in termination of contract.

1 Management

We expect our suppliers to show continuous improvements, be transparent and cooperate. We believe that the best way of facilitating compliance with the Supplier Code and the law is by establishing, implementing and maintaining solid management systems. The Supplier shall:

1.1 Laws and regulations

1.1.1 Have all legally required permits, licenses and registrations to operate.

1.1.2 Be updated on, comply with and be able to prove compliance with applicable laws or regulations regarding human and labour rights, health and safety, environment and ethics.

1.2 Management system

1.2.1 Establish, implement and maintain management systems that facilitates compliance with the requirements of the Supplier Code.

1.2.2 Have company representatives who are responsible for implementation and review of its management systems.

1.2.3 Have a company statement affirming its commitment to high standards of social, ethical and environmental conduct and continuous improvement.

1.2.4 Set up objectives, targets and implementation plan to continuously improve social and environmental performance including regular measurement and documentation.

1.2.5 Develop and implement training programs for employees, ensuring that each employee is equipped with proper skills and knowledge to facilitate implementation of policies, procedures and improvement objectives.

1.3 Monitoring

1.3.1 Permit Zound Industries, or third parties authorised by Zound Industries, to periodically audit and assess suppliers, their subcontractors and next-tier suppliers' facilities and operations. Moreover, Zound Industries has the right to carry out unannounced audits if Zound Industries deems it necessary. This includes permission to conduct interviews and access documents and records related to the Supplier Code.

1.3.2 Propose and implement corrective actions within reasonable time when non-conformities are observed in connection to the audit.

1.3.3 In its own discretion monitor its operations and take immediate and appropriate decisions and corrective actions, where necessary, within the Supplier's operations.

1.4 Supply chain management

1.4.1 Ensure compliance with the content of the Supplier Code at its subsidiaries, partners, suppliers and subcontractors. The Supplier shall at least, but not limited to, evaluate and monitor its direct suppliers of goods and services related to Zound Industries products. Upon request, the Supplier shall be able to share relevant information regarding the supply chain's compliance.

1.4.2 Upon request, provide Zound Industries with name and location of subsidiaries, partners, suppliers and subcontractors of goods and services related to Zound Industries products.

2 Labour and human rights

We expect our suppliers to follow universally recognised human and labour rights and foster a culture where all employees feel safe to express concerns. Employees at our suppliers should be aware of their rights and responsibilities, including being treated and treating others fairly, with respect and dignity. The Supplier shall:

2.1 Forced labour

2.1.1 Not engage in nor support any form of forced labour, whether in the form of prison labour, bonded, indentured labour or human trafficking.

2.1.2 Ensure that no recruitment or training fees, deposits, fines, loans or repayment agreements are requested from employees or potential employees. Uniforms and equipment needed to perform work in a safe way shall be provided for free.

2.1.3 Not withhold employees' original personal certificates or identification documents such as government-issued identification, passports or work permits.

2.1.4 Ensure employees' freedom of movement. Employees shall never be locked into their workplace, shall be able to leave the workstation for toilet and hydration breaks and move freely, including exiting the company premises, during their leisure time.

2.1.5 Ensure that migrant workers have valid work permits and that they are treated fairly, equally and have the same opportunities and rights.

2.2 Employee contract

2.2.1 Provide all employees with a written contract, signed by both parties, in a language understood by the employee. A copy of the contract shall be issued to the employee.

2.2.2 Ensure that the employee contract contains at least, but not limited to, the following: clear statements of the voluntary nature of the employment, notice period and procedures of leaving the job, working hours and guaranteed wage, premium overtime rate, payment and frequency of payment.

2.3 Child labour

2.3.1 Not employ nor support exploitation of children who are less than 15 years old, or less than the age for completing compulsory education in the country of operation where this age is higher than 15.

2.3.2 Have a written remediation plan for child labour. If child labour is observed, suspected or known in Zound Industries supply chain, the Supplier shall immediately report to Zound Industries. Before taking any action the Supplier shall work together with Zound Industries to implement a strategy to ensure protection of the affected child.

2.3.3 Have a process in place for assessing the age of new employees.

2.4 Young workers

2.4.1 Ensure that legally young workers under 18 years of age are protected from overtime and night shifts and heavy, unsafe and hazardous work which might be harmful for their health, safety, morals or development.

2.4.2 Ensure that legally young workers receive appropriate and regular health examinations.

2.4.3 Ensure proper management of student workers by keeping student records, proof that activities are clearly beneficial to the students and that protection of students rights is in accordance with all laws and regulations.

2.5 Harassment

2.5.1 Foster a workplace free of harassment and not tolerate any employees being subject to physical, sexual and psychological harassment, corporal punishment, threats, false promises or any other verbal harassment or abuse.

2.5.2 Prohibit public warnings and punishment systems.

2.6 Discrimination

2.6.1 Not practice any form of discrimination in recruitment and employment practices on illegitimate grounds, including but not limited to: ethnicity, national or social origin, gender, religion, age, disability, marital or parental status, association membership, sexual orientation or political opinion. Decisions about hiring, wages, benefits, training opportunities, work assignment, advancement, discipline and termination must solely be based on experience, qualifications and performance of the employee.

2.6.2 Use transparent wage-setting mechanisms that reflect experience, qualification and performance of the employee.

2.6.3 Not subject employees to mandatory medical tests that have no relevance to the job (i.e. HIV/AIDS and pregnancy tests) during recruitment or post-hiring. No medical test results cannot be used to dismiss or treat employees unfavourably.

2.6.4 Never ask nor warn employees regarding current or future marital status, child status or parental leave during recruitment process or employment practices.

2.7 Wages and benefits

2.7.1 Comply with local laws and regulations or the prevailing industry wage, whichever is the highest, on: minimum wages, premium overtime wages and other elements of wages.

2.7.2 Pay wages regularly, direct to the employee, on time and in full.

2.7.3 Record all wages accurately and provide all employees with a payslip clearly specifying all parts of the salary and how the wages and compensation have been calculated.

2.7.4 Ensure that the employees are granted and correctly compensated for holidays and legally entitled paid leave i.e. parental leave and sick leave.

2.7.5 Provide social security, insurance or medical benefits as required by law.

2.8 Working hours

2.8.1 Have a reliable time recording system which keeps a record of all working hours and divides regular working hours and overtime hours correctly.

2.8.2 Comply with laws and industry standards on regular working hours. A regular working week shall not exceed 48 hours per week in accordance with ILO 1 Hours of Work Convention.

2.8.3 Ensure that overtime does not exceed local legal limits or 12 hours per week, except in temporary extraordinary circumstances.

2.8.4 Ensure that all overtime is voluntary, unless necessary and mandated according to local laws.

2.8.5 Ensure that all employees are allowed at least 24 consecutive hours rest within every seven day period.

2.8.6 Establish regular weekly work schedules and inform employees of the schedule in advance.

2.9 Freedom of association and collective bargain

2.9.1 Ensure that all employees have the right to join any trade union by choice and to bargain collectively. However, in countries where rights regarding freedom of association and collective bargain are restricted by law, the Supplier shall allow workers to freely elect their own representatives. No disciplinary or discriminatory actions may be taken against employees who choose to peacefully and lawfully organise or join an association.

2.10 Right of freedom of expression and privacy

2.10.1 Not, obstruct or interfere with, or retaliate against, freedom of expression.

2.10.2 Ensure that all employees have the right to report or express concerns without fear of retribution or losing their job.

2.10.3 Maintain the confidentiality of any personal information of employees and former employees. Personal information shall only be collected and stored in a safe way where there is a consent of the person concerned.

2.10.4 Respect the privacy rights of employees when implementing monitoring practices. Surveillance cameras shall never be installed in areas where privacy is strictly protected such as toilets, dressing rooms and dormitory areas.

3 Health and safety

We believe that a healthy and safe work environment is important for employees wellbeing. We expect our suppliers to use a risk based approach and value the input of employees to prevent health and safety risks and by value employees. The Supplier shall:

3.1 Health and safety risk prevention

3.1.1 Have a process in place to identify, assess and either eliminate, minimise or control all potential health and safety hazards and risks associated with its operations.

3.1.2 Ensure that relevant health and safety related information is clearly posted in the facility. Each workstation shall have clear signs of personal protective equipment and instructions of proper use.

3.1.3 Ensure that employees receive appropriate health and safety training.

3.1.4 Ensure that relevant personal protective equipment provided is used by the employees.

3.1.5 Actively work for a functional cooperation between employees and managers to continuously improve health and safety in the workplace, for example by implementing a Health and Safety Committee.

3.2 Emergency preparedness

3.2.1 Identify possible emergency situations and implement emergency plans and response procedures for these situations.

3.2.2 Ensure all employees know about identified emergency situations in their own area of operation and how to act if they occur.

3.2.3 Ensure that fully operational firefighting equipment, fire exits, first aid material, emergency plans, detectors and alarms and signs are accessible and sufficient in number throughout the facility.

3.2.4 Ensure that employees trained in first aid and fire safety are present in sufficient number during every shift and can be easily identified.

3.2.5 Ensure that fire and other sufficient emergency drills are carried out regularly.

3.3 Accidents and near accidents

3.3.1 Have a process and system in place to report, investigate and take action on all accidents, near-accidents and unsafe situations.

3.3.2 Ensure that employees have knowledge about accidents and near accidents, understand the importance of preventive work and corrective actions and practice it in their daily work.

3.3.3 Provide necessary medical treatment and facilitate employees return to work, in case of accidents.

3.3.4 Ensure that Zound Industries receive information in case of crises situations related to factories producing products to Zound Industries according to "Zound Industries Crises Procedure for Suppliers v.1.0."

3.4 Ergonomics

3.4.1 Introduce actions to prevent ergonomic risks such as working position, repetitive movements, physical loads and lifting positions. Example of actions include work rotation and adjusting stations to employee's height and reach.

3.5 Workplace conditions

3.5.1 Ensure that toilets, changing rooms, lockers, dining areas, resting/nursing rooms, first aid clinics are clean, safe and sufficient in number. Ensure free access to potable clean water.

3.5.2 Ensure that the workplace is well lit, ventilated and kept at acceptable temperature and noise levels.

3.6 Housing facilities

3.6.1 Ensure that housing facilities provided for employees are clean, safe, meet basic needs and have reasonable personal space for employees. The housing facilities shall have toilets, potable water, showers with warm water, sanitary food preparation areas, storage, fire equipment, emergency exits and adequate heating and ventilation.

4 Environment

We are committed to improve our environmental performance in our own operations and require the same of our suppliers and subcontractors. This includes adoption designing products, choosing materials and technologies with an ambition of using as little resources as possible from our planet. The Supplier shall:

4.1 Environmental management systems

4.1.1 Have process in place to actively optimise the use of finite resources such as energy, water and raw materials. All manufacturing suppliers shall have a certified management system in place according to ISO 14001.

4.2 Emission and waste handling

4.2.1 Implement a systematic approach to reduce waste. Any waste shall be re-used and if not possible, recycled. Landfill shall always be avoided.

4.2.2 Handle hazardous waste i.e. oils, chemicals or batteries with extra care. Separate it from other waste and handle it so as to avoid leakage into air, water or soil.

4.2.3 Identify, monitor, control and treat wastewater. The Supplier shall use appropriate wastewater treatment systems.

4.2.4 Identify, monitor, control and treat emissions to air. The Supplier shall use appropriate air emission control systems.

4.3 Hazardous substances

4.3.1 Implemented methods, procedures and equipment to introduce, handle, label and store hazardous substances in a safe way to minimise negative impact on people and the environment.

4.3.2 Apply the precautionary principle by refraining from using substances, materials or processes where there is uncertainty regarding the negative environmental and health impact. The supplier shall respect all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances.

4.3.3 Ensure to supply products and materials to Zound Industries in line with latest version of "Zound Industries Restricted Substances List v.1.0."

4.4 GHG emissions

4.4.1 Identify, monitor and have a systemic approach to reduce Greenhouse Gas Emissions (GHG) from its own operation including indirect emissions.

4.5 Reporting of product material compositions

4.5.1 Provide detailed and updated information about Zound Industries' products' material composition, such as materials content, weights, as well as recycled and bio-based content in the Bill of Materials upon request.

4.6 Sustainable design

4.6.1 Commit to develop more environmentally friendly, circular and socially responsible products together with Zound Industries, including but not limited to, communicating to Zound Industries about choices and changes in materials, design and production methods from a sustainability perspective.

5 Ethics

We are committed to doing responsible business. We advocate free and fair trade, striving for open and fair competition and ethical conditions within the legal frameworks of the countries where we operate. We expect our suppliers to share the same commitment. The Supplier shall:

5.1 Anti corruption

5.1.1 Not engage in any form of corrupt practices.

5.1.2 Implement processes to prevent all forms of corruption, extortion and embezzlement, at minimum by implementing an anti-corruption policy and providing training to employees.

5.1.3 Be aware that no Zound Industries' employee will provide any advantages to the Supplier in exchange for personal gain.

5.1.4 Be aware of, and accept, that Zound Industries' employees may not accept gifts nor hospitality from the Supplier.

5.2 Conflict of interest

5.2.1 Ensure that personal interests or relationships do not influence decision making. Decisions shall always be objective and fact-based.

5.2.2 Disclose to Zound Industries information regarding any personal affiliations between employees of the Supplier and Zound Industries, such as family members, relatives or friends that may be a conflict of interest.

5.3 Business and product secrecy

5.3.1 Ensure that no Zound Industries' business information nor product secrets are spread to any unauthorised third party.

5.4 Responsible sourcing of minerals

5.4.1 Supply chains that either directly or indirectly contribute to conflicts are unacceptable. Manufacturing suppliers shall have a policy and a due diligence framework in place consistent with the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas"¹ when sourcing minerals from conflict affected areas.

5.4.2 Provide Zound Industries upon request with information regarding smelters or refiners for minerals used in Zound Industries' products such as tin, tantalum, tungsten, gold and cobalt. Information must be provided using the latest version of the Conflict Mineral Reporting Template (CMRT) provided by Responsible Minerals Initiative (RMI)², upon request.

5.4.3 Take necessary actions to continuously improve knowledge regarding components that can contain minerals that may directly or indirectly finance or benefit armed groups.

¹www.oecd.org

² www.responsibleminerals initiative.org