

Demant Group Data Ethics Policy

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Demant

Introduction

This Data Ethics Policy outlines the Demant Group's commitment to handle data with a high level of integrity. The overall objective of this Policy is to encourage and motivate all employees of the Group to handle data with the utmost care and respect and to responsibly take part in ensuring that the Group meets its ambitious standards in this regard. Additionally, the aim is to strengthen our long-term business ambitions by enabling us to continue to build on our heritage as a world-leading hearing healthcare and technology Group developing groundbreaking new technologies.

This Data Ethics Policy applies globally, and it is mandatory for management and employees in the companies belonging to the Demant Group to comply with this Policy.

The Policy goes beyond compliance

The Policy covers all processing of data, including both personal data and non-personal data.

The scope of data therefore goes beyond what is already required by any regulations (for instance the European General Data Protection Regulation). Furthermore, it adds an extra layer to the protection of personal data from an ethical perspective. We already work diligently to ensure that the processing of personal data is done in compliance with regulatory frameworks. With this Policy, we want to make it clear that we treat all types of data with the utmost care and respect.

Our main data ethical principles

1. We acknowledge the importance of data ethics

The Demant Group acknowledges that designing innovative technologies requires processing of data. We take on the responsibility that this data processing entails.

We find that ethical data usage is critical to our ability to stay innovative and to advance our scientific and medical understanding but also to ensure our users' safety and to improve hearing healthcare in general for the benefit of the general public.

2. Our data usage is purpose-driven

We are and have always been a purpose-driven company, aiming to create life-changing differences. This also determines the purpose of data and the ways in which we collect and use such data.

We only collect and use data to create intelligent hearing healthcare solutions, services and communication technologies and bring them to the market. We do not collect and use data unless it serves to meet our ambition of providing new and innovative technologies and services to the benefit of our users.

3. We are transparent

Our key value and the most important part of our DNA is care. As such, care is an inherent part of everything we do. In our view, taking care of our

users also means that we must treat their data with respect. Only this way can we protect our users' trust in us, which is what allows us to provide care for them. We therefore also strive to ensure full transparency in everything we do with data in the Demant Group. Consequently, we are committed to always saying what we do and doing what we say.

4. We take care when we share data

We do not disclose data to third parties unless it serves our purpose to create, develop and market groundbreaking new technologies and services. Furthermore, we will not sell data to third parties.

5. We do not use data to mislead or exploit

We are mindful of what constitutes ethical data usage, for example that it must not be used to mislead or exploit people. This principle applies to all areas but specifically to hearing healthcare solutions and services that require special consideration, as the sale of healthcare products require a higher level of ethical behaviour towards consumers than non-healthcare products.

Our products comply with our Data Ethics by Design procedure

To ensure that the principles set out in this Policy are adhered to, we will – if and when relevant – implement Data Ethics by Design procedures as part of our product development. In doing so, we will ensure

that products are from the outset designed to comply with our data ethics principles. We are responsible for providing documentation that such procedures are adhered to and that data is always handled with the necessary care and respect.

Allocation of internal responsibility for data ethics

We recognise that data ethics must be rooted in the organisation to ensure that we as a Group meet high standards in this respect.

We believe that by activating and involving relevant employees in the organisation, we will reach this high standard.

To ensure full support and engagement, we will appoint and train employees in key functions within the Group to ensure that we respect data ethics when we develop new products and technologies. Group Legal & Compliance will support these employees. Finally, top management is also committed to prioritising the ongoing work on data ethics in the Demant Group.