

**We believe  
life is for living**



# **Doro Business Ethics policy**

## **Code of conduct**

**THIS DOCUMENT INCLUDES POLICIES FOR QUALITY, ENVIRONMENT,  
INFORMATION SECURITY, AND OCCUPATIONAL HEALTH AND SAFETY**

Version 8, 2021-10-27

Doro Business Ethics policy applies to all people who work for the Doro group, including employees and consultants. Regardless if permanently employed or temporarily contracted, as well as students and voluntary workforce. Doro group may have additional policies, but the requirements in this document must always be met.

## Table of Contents

|   |                             |
|---|-----------------------------|
| CONTENT .....   | Erreur ! Signet non défini. |
| GENERAL RULES FOR ALL .....   | 3                           |
| Values .....  | 3                           |
| Anti corruption .....   | 3                           |
| Conflicts of interest .....   | 3                           |
| Human rights .....  | 3                           |
| Prohibition of harassment and abusive behaviour .....                               | 3                           |
| Whistleblowing .....  | 4                           |
| HOW WE TREAT OUR EMPLOYEES .....  | 5                           |
| Occupational health and safety policy for Doro group .....                          | 5                           |
| Equal opportunities and non-discrimination .....                                    | 5                           |
| Freedom of association and the right to collective bargaining .....                 | 5                           |
| Work-life balance .....   | 6                           |
| Employment security .....   | 6                           |
| Compensation and development .....  | 6                           |
| Employee consultation .....   | 6                           |
| CUSTOMER RELATIONS .....  | 7                           |
| Quality policy for Doro group .....   | 7                           |
| Customer satisfaction .....   | 7                           |
| Marketing .....   | 7                           |
| Gifts and favours .....   | 8                           |
| SUPPLIER RELATIONS .....  | 9                           |
| Gifts and favours .....   | 9                           |
| Supplier behaviour .....  | 9                           |
| Control of suppliers .....  | 9                           |
| SOCIETY .....   | 10                          |
| Legal compliance and local customs .....  | 10                          |
| Community involvement and contributions .....                                       | 10                          |
| Fair competition and integrity .....  | 10                          |
| Taxes .....   | 10                          |
| ENVIRONMENT .....   | 11                          |
| Environmental policy for Doro group .....   | 11                          |
| INFORMATION SECURITY, DATA PRIVACY AND PERSONAL DATA PROTECTION .....               | 12                          |
| Information security policy for Doro group .....                                    | 12                          |
| SHAREHOLDERS AND INSIDERS .....   | 13                          |
| Communicating with shareholders .....   | 13                          |
| Insider dealings .....  | 13                          |
| Links to standards and declarations that this policy is based on and supports ..... | 14                          |

## GENERAL RULES FOR ALL

### Values

At Doro, we are proud to follow the values of the company

- We care
- We are trustworthy
- We are visionary

We do this to work towards our vision: To be a full-service technology provider for seniors

*"We want to make technical breakthroughs available to seniors by offering them accessible and easy-to-use versions of the new technology – so they can live better and more fulfilling lives."*

### Anti-corruption

At Doro, all forms of corruption are strictly forbidden, including but not limited to extortion, bribery, nepotism, fraud, and money laundering.

### Conflicts of interest

No employee may be involved in an activity or hold a position outside Doro that is in conflict with the company's business interests. Such conflicts of interest could also include directorships, significant shareholdings, or the employment of family members.

### Human rights

We support the principles contained within the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO Core Conventions on Labour Standards.

When representing Doro, we strive to respect all individuals and their human rights, no matter who they are.

### Prohibition of harassment and abusive behavior

Doro does not tolerate any form of harassment or violence in the workplace. The use of forced labor and child labor is strictly prohibited in all company operations. A process and contacts are clearly defined and communicated in the event that harassment and abusive behavior should occur. Control of compliance is the responsibility of each line manager, and follow-up is done in the recurring employee survey.



## **Whistleblowing**

Everyone can anonymously report anything you suspect may violate laws, other requirements or this code directly to a manager, an employee organization, or through Doro's reporting channel, without any risk of reprisals.

The Whistleblower service is handled by an external party, and the notifications are read by a person with statutory confidentiality. The reporting channel is found on the external web, including full Whistleblower information.

## HOW WE TREAT OUR EMPLOYEES

The responsibility of all managers within the Doro group is to enable and empower all employees and consultants to contribute to the company's development fully.

### Occupational health and safety policy for Doro group

We want to

- promote good health among our employees
- create a good and safe work environment for all
- enable employees affected by diagnosed medical conditions to work on their terms by adjusting the work situation as appropriate

We believe in a connection between health, productivity, and quality.

The CEO has the ultimate responsibility for occupational health and safety in the company. Each employee and consultant, regardless of position, has a responsibility to promote the common good work environment and good company culture.

We enforce existing health and safety legislation as well as other applicable regulations and requirements.

Occupational health and safety work is conducted as a natural part of daily work. We use a systematic approach with regular surveys of the work environment where we implement and follow up the decided actions.

### Equal opportunities and non-discrimination

Employees are recruited and promoted solely on the basis of their qualifications for the job, regardless of race, religion, age, national origin, gender, sexual orientation, political opinion, union membership, marital status, or disability unrelated to the task in question. Doro encourages the positive contribution a diversity of background and experience gives. Control of compliance is done in an evaluation of equal opportunities.

### Freedom of association and the right to collective bargaining

Employees have the right to union membership.



## **Work-life balance**

Where appropriate, Doro supports flexible work schedules and part-time arrangements.

## **Employment security**

Doro commits to ensuring employment security and responsible workforce restructuring. We use responsible redundancy procedures following legal requirements and union agreements in the countries where we operate. We strive to minimize redundancies, and if they are necessary, we shall select people objectively, fairly, and not discriminate.

## **Compensation and development**

Each employee shall be rewarded in a correct and fair manner in accordance with their individual performance and contribution to the success of the company. All employees shall be offered opportunities for appropriate training to help them develop relevant skills, grow within the company, and progress in their careers. Annual appraisals are done with the closest manager, where development plans, targets, and follow-up are discussed.

## **Employee consultation**

Doro strives to maintain good communications with each employee through company information and dialogue.

## CUSTOMER RELATIONS

All work within the Doro Group should aim to fulfill the promises we have made to our customers. Every time a Doro product or service is used, and every time a Doro representative is in contact with a customer is a moment of truth. It is the responsibility of all Doro employees, regardless of profession and position, to help fulfill our promises.

### Quality policy for Doro group

Doro delivers premium products and services. Always with the end user's needs of simplicity and quality at heart.

We continuously improve our products and ways of working to provide high and consistent quality.

To achieve this, we

- check that our customers' explicit and implicit needs are fully met
- regard both our products and services as expressions of our quality
- inform and train our employees and suppliers, to understand the importance of quality
- actively seek feedback on products and ways of working

### Customer satisfaction

Loyal, satisfied customers are the basis of our reputation. Honesty and integrity in all dealings with customers are prerequisites for profitable, long-term business relationships.

### Marketing

Doro will provide customers with accurate product and services information and will only make commitments about our products or our company that we can live up to. Our marketing shall be truthful, not misleading, accurate, and balanced. Marketing communications shall be clearly distinguishable as such. We shall not make unsubstantiated product claims, e.g., environmental or health claims.



## **Gifts and favours**

At Doro, gifts, entertainment, compensation, and personal favors may be offered to a third party only if they are modest in value and consistent with customary business practice. Cash may never be used as a gift. No gifts, entertainment, or personal favors may be offered in contravention of any applicable law or code of practice. Gifts that do not meet the above criteria should be reported immediately to Doro management, who shall determine what measures should be taken. Customers are encouraged to use the Whistleblower function to report violations.

## SUPPLIER RELATIONS

As a company, we are responsible for our selection of supplies.

New suppliers are evaluated regarding the environment, social, and governance performance and shall sign the Doro CSR Policy for suppliers.

### Gifts and favors

No employee should seek or accept any gift, entertainment, or personal favor that might reasonably be believed to have an influence on business transactions. No gifts, entertainment, or personal favors may be accepted in contravention of any applicable law or code of practice. Cash may never be received as a gift. Gifts that do not meet the above criteria should be reported to management, who shall determine how the matter will be dealt with. Suppliers are encouraged to use the Whistleblower function to report violations.

### Supplier behaviour

Doro will inform business partners of the company's values and business principles.

We will not do business with suppliers that fail to comply with

- applicable local legislation, and
- requirements in contracts and the Doro CSR Policy for suppliers

### Control of suppliers

Doro does audits and follows up according to contracts. Non-compliance found at audits, Whistleblower action, or other input will not be publicly reported but will be reported back to the supplier and can lead to the ending of the contracts. We will not audit indirect suppliers in the extended supply chain but will require and control that our suppliers do relevant controls in the supply chain.

## **SOCIETY**

### **Legal compliance and local customs**

Doro employees must comply with all the applicable laws and regulations of a country in which the company and the employee operate. In cases where a conflict exists between more restrictive laws and this Code's principles and values, the law shall prevail. We will respect the local traditions and customs of each country. In cases where there is a conflict between local customs and this Code's principles and values, the Code shall guide the employee's course of action.

Doro respects the intellectual property rights of others. If infringements on intellectual property rights are identified, Doro's intention is to search for an acceptable license agreement.

By annually training our employees, we seek to increase the understanding of different types of corruption to as far as possible avoid all sorts of unethical behavior, which also includes small fees (facilitation money).

### **Community involvement and contributions**

Doro seeks to make a positive and sustainable contribution to the communities in which we conduct business. Employees are encouraged to participate in community affairs, but the company does not support political parties or make political donations.

### **Fair competition and integrity**

Doro conducts business operations in line with fair competition, not participating in any form of bid-rigging or other mechanisms that limit fair competition in tender situations, any form of cartel practices with competitors, such as dividing or allocating markets or customers, or price-fixing.

### **Taxes**

Doro group prohibits tax avoidance through transfer pricing, and we are committed not to be present in tax jurisdictions enabling tax base erosion and profit shifting.

## ENVIRONMENT

### Environmental policy for Doro group

Doro develops environmentally friendly products that meet customer requirements for product safety and quality. It is important to us to develop and supply products with

- long lifetime
- low energy use
- conformity to applicable legislation
- relevant information about our products' environmental properties available
- possibility to recycle materials, where we also aim for materials with low environmental impact

Our employees, customers, and suppliers are important stakeholders for environmental issues. Our environmental management system makes sure the environment is continuously on the agenda.

We will work towards continuous improvement, pollution prevention, and reduction of carbon footprints, using a Life Cycle perspective.

We will comply with applicable laws and other requirements applicable to the organization.

We will encourage our suppliers to actively work with the environment and take responsibility for their products' / services' impact on the environment.

## INFORMATION SECURITY, DATA PRIVACY AND PERSONAL DATA PROTECTION

Our Information Security Management System, enforced by our ISO 27001 certification, helps us achieve a relevant level of information security.

### Information security policy for Doro group

We commit to proactively managing and improving our information security management system. We strive for secure handling of information and to protect the confidentiality, integrity, and availability of all data held on our systems. We maintain a systematic approach to continually lower our exposure to information security risks and threats.

We aim, as far as reasonably possible, to

- assess information security-related risks and implement practical and cost-effective controls to mitigate identified risks and threats
- meet applicable legal, regulatory, and contractual requirements
- prevent interruption to business, and implement, maintain and test business continuity plans
- handle security incidents through an efficient response process and learn from incidents
- provide continuous information security awareness training to all personnel
- provide adequate resources required to manage and support effective implementation of this policy

## SHAREHOLDERS AND INSIDERS

Communication with shareholders and the financial world is regulated by law and always goes through Doro Head Office. All relevant financial information will be published on the Doro web.

### Communicating with shareholders

Doro will provide accurate and timely information on the company's activities, performance, and financial situation to all shareholders in accordance with stock market regulations. Doro's accounting statements will present a true and correct view of the company's financial performance in line with International Financial Reporting Standards (IFRS). Financial reports are validated by authorized auditors.

### Insider dealings

Employees and others with access to insider information are required to follow the Doro insider policy and signing procedures to prohibit insider dealings. We follow applicable legal requirements.



## Responsibilities and use of this document

This document is approved by Doro's CEO.

Responsible for updates is Quality.

The document is translated to local languages if needed.

This document shall be used for

- yearly training of all Doro employees, including also temporary hired personnel and consultants
- extra training of personnel making decisions on procurement and what suppliers to use
- one of the inputs at the annual risk assessment of sustainability, done by group management
- the basis for Doro CSR policy for suppliers

## Links to standards and declarations that this policy is based on and supports

|  |   |
|--|---|
| The Universal Declaration of Human Rights  | <a href="https://www.un.org/en/universal-declaration-human-rights/">https://www.un.org/en/universal-declaration-human-rights/</a>   |
| International Labour Organisation ("ILO")  | <a href="https://www.ilo.org/global/standards/lang-en/index.htm">https://www.ilo.org/global/standards/lang-en/index.htm</a>   |
| ILO Minimum Age Convention (No. 138)   | <a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138</a>   |
| ILO Worst Forms of Child Labour Convention, 1999 (No. 182)   | <a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::12100:P12100_INSTRUMENT_ID:312327:NO">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::12100:P12100_INSTRUMENT_ID:312327:NO</a>                                 |
| Article 32 in The United Nations Convention on the rights of the child                                 | <a href="https://www.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf">https://www.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf</a> |
| ILO standard Forced Labour Convention, 1930 (No. 29)   | <a href="https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C029">https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C029</a>   |
| ILO standard Abolition of Forced Labour Convention, 1957 (No. 105)                                     | <a href="https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C105">https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C105</a>   |
| ILO Equal Remuneration Convention, 1951 (No. 100)  | <a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::12100:P12100_INSTRUMENT_ID:312245:NO">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::12100:P12100_INSTRUMENT_ID:312245:NO</a>                                 |
| ILO Standards Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) | <a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C087">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C087</a>   |
| ILO Standard Right to Organise and Collective Bargaining Convention, 1949 (No. 98)                     | <a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C098">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C098</a>   |
| ILO Discrimination (Employment and Occupation) Convention, 1958 (No. 111)                              | <a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C111">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C111</a>   |
| United Nations Convention against Corruption   | <a href="https://www.unodc.org/unodc/en/corruption/tools_and_publications/UN-convention-against-corruption.html">https://www.unodc.org/unodc/en/corruption/tools_and_publications/UN-convention-against-corruption.html</a>                           |
| OECD Guidelines for Multinational Enterprises  | <a href="#">Guidelines for multinational enterprises - OECD</a>   |