

Doro Business Ethics

**(Code of conduct for employees,
suppliers, customers and board)**

Version 7

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Approved by: Carl-Johan Zetterberg Boudrie, CEO

EMPLOYEES

Enabling and empowering employees and consultants of Doro to fully contribute to the company's development is the responsibility of all managers within the Doro Group. Doro Business Ethics gives you clear guidance on which areas you need to focus your attention.

DORO BUSINESS ETHICS

Health and safety. Doro strives to be an attractive employer by creating a working environment based on collaboration, responsibility and openness. The wellbeing of employees is a high priority, and the company is committed to providing safe and healthy working conditions in line with best practice. Responsibilities and processes, e.g. how to report work-related accidents and incidents, are found in internal Doro documents on the Intranet.

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 encourage the positive contribution a diversity of background and experience gives. Control of compliance is done in an evaluation about equal opportunities. This is done at head quarters in cooperation with union representatives.

Prohibition of harassment and abusive behaviour. Doro does not tolerate any form of harassment or violence in the workplace, and the use of forced labour and child labour is strictly prohibited in all company operations. A process and contacts are clearly defined and communicated in the event that harassment and abusive behaviour should occur. Control of compliance is the responsibility of each line manager and follow up is done in employee surveys twice a year.

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 ensure 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 minimise 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 their careers. Annual development talks are done with the closest manager, where training plans, targets and follow-up is discussed.

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.

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



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

Whistle Blower. Employees (including hired labor) can report anonymously anything you suspect may violate laws, other requirements or this code directly to the manager, to an employee organisation, or through Doro's reporting channel, without any risk of reprisals.

The Whistle Blower service is handled by an external party and the notifications are read by a person with statutory confidentiality. The report channel is found at www.wbdoro.se
Full Whistle Blower information is found on

<https://corporate.doro.com/sustainability/sustainability/whistle-blower-function/>

CUSTOMERS

Our customers are the only reason why we exist as a company. All work within the Doro Group should aim to fulfil 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, representing a fulfilled or broken promise. It is the responsibility of all Doro employees, regardless of profession and position, to help fulfil our promises.

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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.

Product and services quality. Doro is committed to delivering products and services that answer real needs and enables users to continue doing the things they have always enjoyed doing. This is a work that begins with product and services development at Doro, and continues with the manufacturing process and the delivery of the services we offer.

Gifts and favours. At Doro, gifts, entertainment, compensation and personal favours 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 favours 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:

<https://corporate.doro.com/sustainability/sustainability/whistle-blower-function/>

SUPPLIERS

As a company, we are responsible for our selection of supplies. In order to extend the impact of our values and beliefs throughout the supply chain, suppliers should be informed about our Doro Business Ethics and asked to accept it. In addition to our Doro Business Ethics, our Supply Chain is bound to sign the Doro Corporate and Social Responsibility Policy.

Doro Business Ethics and Doro Corporate and Social Responsibility Policy applies to all the Suppliers, the sub-contractors' employees and consultants, regardless if permanently employed or temporarily contracted, whether they are directly employed or supervised.

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Gifts and favours. No employee should seek or accept any gift, entertainment or personal favour that might reasonably be believed to have an influence on business transactions. No gifts, entertainment or personal favours 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 Whistle blower function to report violations: <https://corporate.doro.com/sustainability/sustainability/whistle-blower-function/>

Human rights. 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, do not uphold basic human rights, fail to have a safe working environment or disregard environmental issues.

Doro does not tolerate any form of harassment or violence in the workplace of our suppliers. The use of forced labour and child labour is prohibited for all suppliers working with Doro. The definition of forced labour is the ILO Forced Labour Convention (No. 29) and the Abolition of Forced Labour Convention (No. 105). The definition regarding child labour is the ILO Minimum Age Convention.

Environmental issues. Concern for the environment is something we are all constantly reminded of, and at Doro we treat such concern with the importance it deserves. This we do by following the directives related to environmental issues, local legislation and looking for ways to reduce the impact of our work and products on the environment.

Doro will not do business with suppliers that disregard environmental issues or the related legislation.

Doro's most important product suppliers are ISO 14001 certified and we are working to have all product suppliers certified.

Safe workplace. Doro request from our suppliers to meet all applicable legislation concerning safe working conditions regardless of if the work is carried out at own premises or as contractor at a Doro site.

Doro's most important product suppliers are OHSAS 18001 or ISO 45001 certified and we are working to have all product suppliers certified.

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

Conflict minerals. Doro's Product Suppliers are obligated to have a clear policy in place regarding conflict minerals and to ensure traceability with tin, tungsten, tantalite, and gold.



Control of suppliers. Doro does audits and follow up according to contracts. Non-compliance found at audits, whistle-blower action or other input will not be publicly reported, but will be reported back to the supplier and can lead to 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 AND THE ENVIRONMENT

Under this heading you will find explanations for the relation between our Code of Conduct and local laws and customs; Doro's role in the community; and Doro's environmental ambitions.

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

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

Environmental impact. Doro is committed to preventing or otherwise minimising and mitigating any harmful effects our operations or products have on the environment. We aim to reduce the environmental impact of products throughout their life cycles.

Doro's main contributor of environmental impact originates from production and transport of our products. This does however not reduce the need for awareness and requirements in the European services or operation.

Doro will always meet or exceed the environmental requirements placed by the authorities in our country of operation.

The Doro Environmental policy and the ISO 14001 certificate is found in www.doro.se.

Information Security, Data Privacy and Personal Data Protection. Doro commit to proactively manage and continually improve its Information Security Management System, enforced by our ISO 27001 certification. We strive for secure handling of information and to protect the confidentiality, integrity and availability of all data held on our systems, this includes protection of Personal Data and following applicable laws and regulations. We maintain a systematic approach to continually lower our exposure to information security risks and threats.

SHAREHOLDERS AND FINANCE

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 www.doro.com and employees will also find the information on our intranet.

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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.

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.

Responsibilities and use of this document

This document is approved by Doro 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. Training includes a written confirmation from each trained person, that they have read and understood the information.
- Extra training of personnel taking decisions on procurement and what suppliers to use.
- One of the inputs at the annual risk assessment of sustainability, done by group management.
- Basis for Doro Corporate Social Responsibility policy, which is a policy that all suppliers outside of EU and North America are required to sign before a business relation starts. (Doro CSR policy is approved by CEO and follow up of compliance is done by Operations).