

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**

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.



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## Introduction

### Mission, Values and vision

Mission:

We make technology accessible for seniors – so they can live better lives.

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

- Trust
- Ease
- Care

We do this to work towards our Vision: We will become the leading European technology brand for seniors

### Whistleblowing

Our Whistleblowing channel can be used to report suspected misconduct or wrongdoings in Doro. The purpose of the reporting channel is to prevent and detect fraud and corruption, illegal activities and non-compliance with rules in a range of areas. It can also be about illegal, unethical or harmful activities that can negatively affect others. Anyone internally or externally can report directly to a manager, an employee organization, or through Doro's Whistleblowing channel, without any risk of reprisals. When using the Whistleblowing channel the reporter can remain anonymous and is protected from reprisals by law.

More information about the Doro whistleblowing procedure, including contact information can be found on the Doro external web site: [Whistle-blowing procedure \(doro.com\)](https://www.doro.com/whistle-blowing-procedure)



## Trust - How we do business

### Marketing and 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.

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. Doro shall not make unsubstantiated product claims, e.g., functional, environmental or health claims and does not use endorsements or markings intended to warrant trust, quality or environmental without the right to do so.

### Communicating with shareholders and other stakeholders

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

The detailed internal Doro Insider policy defines responsibilities related to insider information in the company as well as reporting obligations to authorities, how persons with insider information are identified and informed of their obligations and trade limitations. Doro Insider policy also states that any employee, regardless if identified on the insider list, that is in the possession of any kind of information about the Doro Group which is likely to have an impact on the share price and which is not publicly available via a press release, is prohibited from using this information in any decision to buy or sell Doro shares. Likewise, the employee is prohibited from sharing such information with any and all other parties.

Doro applies a 30-day silent period prior to the release of annual and interim reports. Doro has a defined Insider Policy informing persons with access to insider information of the limitations and responsibilities they have in this situation. The persons with access to insider information are required to follow the Doro insider policy, including informing their families and close relations of the policy as well as signing the procedures to prohibit insider dealings. Doro follows applicable legal requirements.

### Anti-trust: Anti-corruption, Anti-bribery

At Doro we strongly believe in open and fair competition. All forms of corruption are therefore strictly forbidden regardless if the purpose is for personal or business gain. This



absolute ban includes but is not limited to any form of monetary, favours or other gain in forms of bribery, kickbacks, patronage or favouritism, facilitation payments, donations, extortion, fake reviews or fraud, money laundering.

Doro evaluates and selects suppliers and business partners based on competences and commercial factors and does not condone discrimination, patronage or favouritism. Equally Doro does not participate in any form of anti-competitive alliances or any form of collusion such as cartels, bid-rigging, price fixing or illegal activities as money laundry or tax evasion.

Doro respects competitors and do not discredit their company or products, disseminate information in aim of harming the operation or business or deliberately obstruct competitors. Doro respects patent and design rights.

Doro ensures employees keep themselves updated on risks of corruption as relevant for their roles. Doro provides an annual training for our employees, to increase the awareness of different types of corruption.

## **Gifts and entertainment**

Giving and accepting gifts, entertainment, compensation, and personal favours can easily be interpreted as corrupt behaviour and should thus be avoided. Moderate entertainment, for example meals, or company give-aways may be offered or accepted as part of business meetings and business exchange but in these cases, it must be clear that no business or other favour in turn is expected. Cash or gifts for personal use is never acceptable.

No gifts, entertainment, or personal favours may be offered or accepted in contravention of any applicable law or code of practice. Customers and suppliers are encouraged to use the Whistleblowing channel to report violations.

## **Supplier evaluation, support, and control**

As a company, Doro is responsible for the selection and continuous evaluation of suppliers. Suppliers are informed of the possibility to use the Whistleblowing channel. The Doro CSR Policy for suppliers defines the requirements on suppliers based on the requirements on Doro and our internal policies. New suppliers are evaluated regarding the environment, social, and governance performance and shall sign the Doro CSR Policy for suppliers. Suppliers of products are evaluated on annual basis by a third-party auditing service and other suppliers are assessed on regular basis based on risk.

If required, Doro offers training to new suppliers to support them to be compliant. Doro will not select suppliers that fail to comply with applicable local legislation or requirements in contracts and the Doro CSR Policy for suppliers. When new requirements are added, Doro will offer training to explain our expectations, as well as reasonable time for implementation.



If breaches of the Doro or legal requirements are identified and the supplier does not take proper actions, Doro will consider discontinuing the business relationship. If breaches are intentional and severe, the relationship will be terminated as soon as practically possible.

### **Information security, data privacy and personal data protection**

Doro is committed to maintaining information security, including confidentiality, integrity, accuracy, and traceability. Doro believes that transparency of sustainability information will bring development of a sustainable society forward, but this transparency will never extend to our own, or our business partners', insider information or potential insider information, confidential, business internal or internal information,

Doro ensures protection of the personal data required to maintain our business. Likewise, Doro endeavours to only keep the data absolutely needed. Doro takes care to follow applicable data protection laws.

## Care - Part of society

### Human rights

Doro supports the principles contained within the Universal Declaration of Human Rights, the UN declaration of rights of the child, 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.

### Freedom from discrimination

Doro does not tolerate any form of harassment, abuse, or violence in the workplace nor in the supply chain. Child labour is strictly forbidden. Young workers, for example conducting work during school holidays, are not given tasks that may result in injury. Bound or forced labour is strictly forbidden and Doro issues and publish a renewed statement against bound and forced labour, e.g., modern slavery, on annual basis.

Employees and others are encouraged to use the whistleblowing channel or report directly to a line manager in case of breaches.

### Legal compliance and local customs

Doro and our 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. Doro 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 shall endeavour to find an acceptable license agreement.

### 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.

### Community involvement and contributions

Doro is part of the society and as a corporate citizen seeks to make a positive and sustainable contribution to the communities in which we conduct business. As such, Doro may participate in policy definition, charities, or sponsorships in line with the Doro mission and values. Doro is member of local business organizations in key markets and participate in policy definition through these organizations.



Employees are encouraged to participate in community affairs, but the company does not support political parties or make political donations.

## Health and safety

Doro continuously strive to reduce risks of work-related injury and health issues. The workplace shall be safe, and ergonomically as well as psycho-socially suitable to enable a long and healthy life in line with our company mission. Each site has its local risk assessment and risk reduction program and arranges regular work health and safety reviews. Identified equipment, tasks, or work environment which may cause injury, have clear safety instructions and the employees are provided with ample training. Special attention to a good work environment is taken for vulnerable employees, for example young, pregnant, disabled, or older.

Occupational health and safety topics are included in the introduction of all new employees, including fire safety and evacuation routes. Our offices are equipped with AED (automated external defibrillator) and each office has appointed employees trained to support in case of injuries, illness, or evacuation. Evacuation drills are performed on regular basis at least according to local laws or recommendation.

## Work-life balance

Doro offers the possibility to partially work remotely as defined in “remote work policy”, provided it does not constitute an obstacle from the perspective of the business. Doro believes that remote work can strengthen commitment, well-being and facilitate the employees’ work life balance.

Normal employment is full time as defined in local laws and agreements. Possibility for part time and other non-regular employment forms is reviewed on initiative of the employee.

## Equal opportunities, non-discrimination and fair workplace

As a global company with a diverse workforce Doro encourages the positive contribution a diversity of background and experience gives in any team. We strive to build diversity in functions as well as project teams. No employee or applicant will be treated more or less favourably based on their race, religion, age, national origin, gender, sexual orientation, political opinion, union membership, marital status, pregnancy, disability unrelated to the task in question, current site of employment in Doro if employed or any other reason.

Employees are recruited, promoted given opportunities for development solely based on their qualifications for the job. Equally, no discrimination is done in case of redundancy.

To protect the privacy of employees and, since it does not in any way impact the ability or qualification of the employee, Doro does not keep records of factors that can be a base for discrimination for example race, religion etc and thus do not map diversity in the company or in functions. Diversity review regarding gender is made on annual basis.





## **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. Through annual performance management and development cycle all employees are offered opportunities for appropriate development including 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.

## **Employment security**

Doro commits to ensuring employment security and responsible workforce restructuring if ever needed. Doro uses responsible redundancy procedures following legal requirements and union agreements in the countries where we operate. Doro strives to minimize redundancies, but if so required, Doro endeavours to select people objectively, fairly, and not to discriminate. Potential reductions are negotiated with local employee representation in accordance with local law and practice.

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

Employees have the right to union membership or other form of joint employee representation as well as collective bargaining.

## **Employee consultation**

Doro strives to maintain good communications with all employees through company information and dialogue. As required by local laws, all major changes, organization changes and redundancies are communicated and negotiated with unions or employee representatives.

## **Conflicts of interest**

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

## **On site consultants and temporary workers**

On site consultants and temporary workers that work as part of the team have the same rights and responsibilities regarding safe work environments, no discrimination or harassments, and conflict of interest as employees.

## Management system policies

### 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 commit to continuously improve our management system and our products 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

### Environmental policy for Doro group

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

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

We commit to continuously improve our management system in order to reduce our environmental and carbon footprint, using a Life Cycle perspective.

We will continuously improve repairability and availability of spare parts to enable a prolonged lifetime of our products and move towards a circular economy.

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.

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



## **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 commit to using a systematic approach with regular surveys of the work environment to continuously improve management system

## **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

## Responsibilities and use of this document

This document is approved by Doro's CEO. Regulatory and compliance Mgmt in cooperation with HR are responsible to maintain the document. The document is translated on request to local languages for understanding of employees, customers or suppliers.

Purpose of this document is to provide high level statement and guidance on business ethics in Doro. The management system policies are included in this document since the business ethics principles are reflected in these policies and implemented in the integrated management system where further detailed policies, processes and procedures can be found. This document shall be used for

- communication of Doro policies and whistleblowing channel to all external stakeholders.
- Internal guideline and yearly training of all Doro employees, including temporary hired personnel and consultants
- the basis for Doro CSR policy for suppliers
- Together with risk assessments support identification of need for additional training for selected groups to for example ensure ethic business practice, safe workplace, good information management and other activities and decisions impacting sustainable development.

**Doro supports and has, as applicable, based this policy on following declarations, conventions and agreements**

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>
UN Sustainable development goals	<a href="#">THE 17 GOALS   Sustainable Development (un.org)</a>
UN Global Compact	<a href="#">Homepage   UN Global Compact</a>
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>
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>
International Covenant on Civil and Political Rights	<a href="#">International Covenant on Civil and Political Rights   OHCHR</a>
International Covenant on Economic, Social and Cultural Rights	<a href="#">International Covenant on Economic, Social and Cultural Rights   OHCHR</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>
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>
OECD Guidelines for Multinational Enterprises	<a href="#">Guidelines for multinational enterprises - OECD</a>
The Convention on Biological Diversity including Cartagena and Nagoya protocols	<a href="#">Text of the Convention</a> <a href="#">The Cartagena Protocol on Biosafety</a> <a href="#">The Nagoya Protocol on Access and Benefit-sharing</a>



Convention on International Trade in Endangered Species of Wild Fauna and Flora	<a href="#">Convention on International Trade in Endangered Species of Wild Fauna and Flora   CITES</a>
Minamata Convention on Mercury	<a href="#">Minamata Convention on Mercury (Text and Annexes)   Minamata Convention on Mercury</a>
Stockholm Convention on Persistent Organic Pollutants (POPs)	<a href="#">Text of the Convention</a>
Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade	<a href="#">Overview</a>
Montreal Protocol on substances that deplete the Ozone Layer  The Vienna Convention for the Protection of the Ozone Layer	<a href="#">The Montreal Protocol on Substances that Deplete the Ozone Layer   Ozone Secretariat</a>  <a href="#">The Vienna Convention for the Protection of the Ozone Layer   Ozone Secretariat</a>
Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal	<a href="#">Basel Convention &gt; The Convention &gt; Overview</a>
Convention on Wetlands of International Importance especially as Waterfowl Habitat	<a href="#">Convention on Wetlands of International Importance especially as Waterfowl Habitat   UNESCO</a>
International Convention for the Prevention of Pollution from Ships	<a href="#">International Convention for the Prevention of Pollution from Ships (MARPOL)</a>
United Nations Convention on the Law of the Sea	<a href="#">UNCLOS+ANNEXES+RES.+AGREEMENT</a>