

United Nations Global Compact Communication on Progress



Message from the CEO

At the William Demant Group, we have actively supported the UN Global Compact initiative since spring 2010. This is our fourth Communication on Progress report, summarising how, on a global scale, we embrace, support and act upon the principles of human rights, labour rights, environmental protection and anti-corruption.

The requirements of the Global Compact initiative provide us with a good framework for corporate social responsibility (CSR), and we are confident that by using a globally recognised framework for reporting our policies, activities and results, we will be able to further systematise our efforts in the areas within our natural sphere of interest where it is possible for us to embrace social, environmental and ethical challenges beyond our legal obligations.

Already, the UN Global Compact initiative is incorporated into our mission statement, which states: "All Group companies seek to promote a stimulating and rewarding working environment through a flexible, knowledge-based organisational structure. Moreover, the Group is committed to high standards of ethics, quality and fairness and is dedicated to meeting its environmental and social responsibilities."

We will continue to be committed to support the Global Compact initiative and its principles, by issuing an annual publication on our work with CSR, the Communication on Progress.

Niels Jacobsen
President & Chief Executive Officer

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United Nations Global Compact Communication on Progress for 2013

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On ethics and principles

Deeply rooted in our foundation and corporate culture lies an effort to meet the social and environmental responsibilities within our sphere of influence. Our ethical requirements and behaviour along with our integrity in business affairs are high – in fact, in many cases our standards are above the legislative demands imposed upon us in the markets where we operate.

Before we signed up for the United Nations Global Compact in 2010 we had already developed 14 ethical principles of our own, covering the aspects of ethics we find especially important to abide by. In order to align and create an overview of our progress both with respect to the Global Compact principles as well as our own 14 principles, we have organised relevant projects according to both approaches.

For the full overview please refer to <u>Table: UN Global Compact CoP 2013</u> in the last section of this report.

Our responsibility

To us, acting responsibly means meeting certain principles and always following local legislation. In addition to this, it also means doing more than just the minimum or just taking the actions required by law. In this context we find it relevant to mention how our parent, the Oticon Foundation, in 2013 awarded over DKK 90 million for social, cultural and scientific purposes.

The Oticon Foundation

In the objects clause of the deed of foundation the alleviation of hearing loss is a primary focus. Thus, in 2013 DKK 76 million was donated to educational purposes and research projects within the audiological field.

Two research centre projects should be pointed out here:

1: In 2013, a research centre at the Technical University of Denmark (DTU) was granted financial support of DKK 5,5 million from the Oticon Foundation. Behind Centre for Acoustic-Mechanical Micro Systems or 'CAMM' for short are the three Danish hearing aid manufacturers Oticon, Widex and GN ReSound. The centre focuses on the interaction between acoustics and mechanics, and both DTU Mechanics and DTU Electro participate in the collaboration. The purpose of the centre is to create a unique research and educational platform for the development of micro systems – this type of research is important for the acoustic and mechanical design of future hearing aids – thus improving the possibility of making products even smaller. The research group will eventually consist of 10 to 15 researchers, including postdocs and PhD students and has been granted a total of DKK 25 million, half of it from DTU.

2: In 2013, with a grant of DKK 6 million from the Oticon Foundation, a new research group, Interacoustics Research Unit (IRU), was founded at DTU. The purpose of the group is to do research into the hearing diagnostic field, and the project is – in popular terms – the 'missing link' in the DTU set-up where Oticon already has a close cooperation with DTU through the Centre for Applied Hearing Research (CAHR), the Centre for Acoustics and Micro Mechanics (CAMM) and the Oticon Centre of Excellence – all heavily funded by foundation grants. Thus, the new diagnostic research group is a natural diagnostic addition to the applied and basic research conducted by CAHR and the Oticon Centre of Excellence in the field of audiology.

Furthermore, for several years The Oticon Foundation has funded the IDA Institute which develops tools to support people with hearing impairment in their process of recognition and treatment. The institute also develops and communicates information about hearing loss to the general public. The work of the institute aims to positively impact hearing-impaired persons and hearing care professionals around the world by making patient-centred care the core of hearing care practice, and by promoting research and education within the field of acoustic communication. In 2013, the foundation granted a total of DKK 12 million to the institute.

Policies

Generally, we operate in compliance with our own 14 principles, covering corporate governance, human and labour rights, environmental protection and business ethics. These principles serve as guidelines for our development of dedicated policies and action plans and have been developed in line with the Global Compact initiative.

As an example of how a principle becomes a policy, we have laid down a <u>business ethics</u> policy that includes a set of rules for the way we interact with customers, business partners and other stakeholders.

In 2012 we drew up an <u>equality policy</u>, containing an action plan stipulating how to increase the number of female managers at all levels. In 2013, this specific policy has received further attention. Please refer to the 'Labour' paragraph.

Policies into action

Global Compact – a universal tool

Since our first Communication on Progress to the UN Global Compact in spring 2011, we have experienced progress within several of the four focus areas covered by the 10 principles. It is a commitment to furthering principles relating to human rights, labour rights, the environment and anti-corruption.

As the framework is a universally recognised tool used for systematising and reporting responsibility initiatives over a continuous period of time, it indicates how we have developed so far and also whether we are moving along the right path. In other words, it acts as guidance for us to maintain and strengthen our focus within corporate social responsibility.

Our Communication on Progress is published on the UN Global Compact website as well as on our own website.

In the subsequent paragraphs our efforts are aligned with the four focus areas and the 10 principles of UN Global Compact.

Human rights

Principle 1: "Support and respect the protection of internationally proclaimed human rights."

Principle 2: "Businesses should make sure they are not complicit in human rights abuses."

At William Demant, more than 90% of our turnover comes from the OECD countries where violation of human rights is not an issue that companies need to address through special projects or increased attention. Securing human rights is covered by local legislation which we, of course, follow, thus acting in accordance with UN Global Compact principle 1 and 2.

In countries of operation outside OECD we only employ and conduct business with highly skilled labour, selling and handling our advanced products. Violating proclaimed human rights is simply against our business model – not only is it against our own <u>business ethics policy</u> it would also harm our business. Thus, where local legislation does not naturally protect human rights, labour rights and serve environmental interests – e.g. in China – we use our <u>code of conduct</u> to ensure that high standards are met when dealing with e.g. suppliers which are beyond the boundaries of our own company. For more information on our code of conduct please also refer to 'Labour, principle 4'.

Improving conditions for people less fortunate

Even though it can hardly be justified as protection of human rights it is still worth pointing out how we make special efforts to improve conditions for people less fortunate, be it regarding general health condition or with focus on people close to our core business: the hearing-impaired.

In 2013, employees at William Demant in Denmark collectively supported the international movement, Movember, which encourages people to donate money to support men's health, e.g. through research on and the prevention of prostate and testicular cancer, and through information on men's general state of health, creating awareness of 'doing something in time'. The William Demant Team won a national 2nd place collecting a total amount of over DKK 100,000 to the campaign. The Oticon Foundation also contributed to the team collection.

In a different part of the world, the Oticon Foundation granted money to a mobile hearing clinic in Hong Kong, and since 2010 the Oticon Foundation has supported The Global Foundation for Children with Hearing Loss in their efforts to improve conditions for children with hearing impairment in Vietnam. Among other activities, the Global Foundation develops educational initiatives for parents and teachers working with hearing-impaired children and also helps these children gain easier access to hearing aids. So far, the project has been able to help more than 1000 children with hearing loss.

In The Amazons and in South Africa, the Oticon Foundation has supported projects establishing local hearing clinics. These projects involve volunteers from local Oticon affiliates as well as social workers, specialists from universities, hospitals and audio clinics, primarily in The United States.

Labour

Principle 3: "Uphold the freedom of association and the effective recognition of the right to collective bargaining"

The William Demant Group has signed collective agreements with relevant labour unions. Subsequently, we negotiate and sign local agreements, duly considering local conditions, thus further improving terms regarding salary, working hours, salary increments, education etc.

We respect the individual's membership of labour unions.

Principle 4: "Uphold the elimination of all forms of forced and compulsory labour"

Supplier code of conduct – providing a safe and healthy working environment

Suppliers are one of our special focus areas. All suppliers must sign a comprehensive <u>code of conduct</u> that lists criteria, governing aspects of human rights, labour rights, the environment as well as anti-corruption – in fact, all four principles of the Global Compact. Thus, this code of conduct covers more than just Principle 4, but the compliance with our policy is described under Principle 4, as we focus our attention on our Chinese suppliers in a part of the world where labour relations are a big issue.

The code has been used since 2010 throughout the Group, and at the end of 2013, 237 of our suppliers of components and packaging materials had signed the code, promising to comply with the rules. That is eight more suppliers than in 2012. In terms of value, we buy about 90% of our direct materials for production and distribution from this group of suppliers.

We select and currently assess our suppliers based on this code. The suppliers are grouped in three categories according to the level of risk of breach of our code of conduct. The risk assessment is based on William Demant's own methodology. It is subject to independent audit and is based on the supplier's geographical presence, sector, management practices and strategic importance for William Demant. The categorisation of suppliers helps us prioritise the resources needed for further dialogue with the suppliers.

If we find that there is a risk that a supplier does not live up to our code of conduct, we carry out an audit and prepare a report, listing the items that need to be addressed before we can initiate or continue cooperation with that supplier. In 2013, we performed 24 CSR audits, six of which were carried out by an external auditing firm. Of the audits made in-house, 10 were initial audits and eight were follow-ups on previous audits, i.e. to control that initiatives contained in prior action plans had indeed been carried out. All 24 suppliers had complied with the requirements we had made, which means that no collaboration agreements were discontinued due to noncompliance.

Basically, the supplier is responsible for remedying any shortcomings, but in many cases, we work out a common solution. However, we do have a zero tolerance policy in some areas, such as child labour and forced labour.

Principle 5: "Uphold the effective abolition of child labour."

We do not use child labour at all. Not only is it against our business ethics policy but it is also impossible due our advanced products and services. The vast majority of our employees as well as the employees of the companies with which we conduct our business are highly skilled, having gone through years of training and/or education enabling them to develop, sell and handle the products.

Principle 6: "Uphold the elimination of discrimination in respect of employment and occupation"

More female managers

We work actively to encourage more women to seek executive and managerial positions. In 2012, to formalise and support this goal we therefore developed a policy and action plan with a view to increasing the share of female managers in the William Demant Group. We simply called it 'More female managers'.

In addition to the William Demant policy initiated in 2012, new rules for the gender-specific composition of top management in all large Danish companies became effective 1 April 2013. These rules oblige the companies to set a target for the representation of the under-represented gender on the company's board and to set a deadline for achievement of such target.

Thus, in April 2013, the Board of Directors of William Demant set the following target and deadline: Within a period of four years, one woman must be elected to the Board of Directors. On 26 February 2014, the Company has not yet elected a woman to the Board, which means that in order to meet the target a woman must be elected within the next three years.

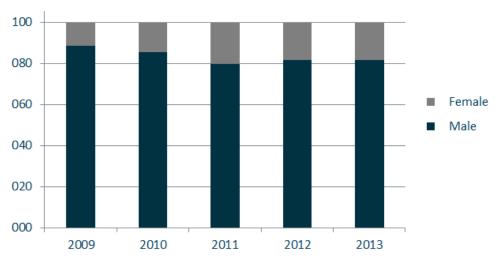
To comply with the new Danish rules, companies must adopt policies on how they will further women's access to managerial positions in the company based on the assumption that more women in managerial positions will – generally speaking – provide the basis for the future recruitment of women as board members. At the end of 2013, concrete initiatives supporting the policy were decided upon.

One initiative is about taking a 'talent management approach' with a view to furthering gender distribution and female advancement. The outcome of this new approach will be greater focus for managers on guiding and nudging female talents towards pursuing opportunities for promotion.

With regard to the external recruitment process to increase the base of female employees and thus the number of potential female managers, relevant departments in the William Demant Group must prioritise sending female employees to job fairs. In job advertisements and in our general employer branding material, we will further balance the tone of voice between 'male' and 'female' connotations in our communication, ensuring the use of female employees in employer branding visuals. Also, when cooperating with external recruiting agencies, we require qualified female candidates in the second round.

As far as the number of female managers at the Group's other management levels is concerned, corporate companies focus on furthering the number of women in managerial positions. And the trend is positive. Thus, over the last five years, the total ratio of female managers has risen from 11% in 2009 to 18% in 2013. In senior management the number has doubled from 7% to 14%. We still have a way to go when it comes to top management, and we did experience a small total setback of 2% from 2011 to 2012 which remained unchanged from 2012 to 2013, but with effort and focus, we aim to improve our internal recruiting procedure, so in the future we should see the increase of women at all levels, including top management.

It is important, however, to keep in mind that all these initiatives do not change our basic recruiting goal, which is to always seek, hire and promote the best qualified employees – gender set aside.



Development in female-male ratio, total management

Management level		Top management	Senior management	Middle- and first line management	Total		
2009	Male	100%	93 %	84 %	89 %		
	Female	0 %	7 %	16 %	11 %		
2010	Male	1100%	87 %	82 %	86 %		
	Female	0 %	13 %	18 %	14 %		
2011	Male	100%	83 %	73 %	80 %		
	Female	0 %	17 %	27 %	20 %		
2012	Male	100%	88 %	75 %	82 %		
	Female	0 %	12%	25 %	18 %		
2013	Male	100%	86%	75%	82%		
	Female	0%	14%	25%	18%		

Development in male-female ratio, from top management to first-line management

Environment

Principle 7: "Support a precautionary approach to environmental challenges"

Principle 8: "Undertake initiatives to promote greater environmental responsibility"

Naturally, we comply with all current environmental rules and regulations in all the countries in which we operate. Our product-related environmental impact is fairly limited. By way of example, a hearing aid weighs just 2-6 grammes and contains no harmful substances. Putting our production into perspective, the total weight of our entire annual output of hearing aids only adds up to approximately 12 tonnes. Even with our production of diagnostic equipment the total is less than 50 tonnes.

Restricted lists

Although the use of raw material is limited compared to other industries, we still encourage a precautionary approach to environmental challenges. Thus, we have implemented the use of 'restricted lists'. A restricted list is a list of chemicals that are somehow restricted from use in hearing aids. The document lists all relevant components and materials, which are banned or restricted. In 2013, we updated the list and now ban the use of all phthalates. This exceeds the legislative requirements.

It is mandatory for our suppliers to comply with the restricted list, which is controlled through a declaration of conformity and/or audits. The list is an initiative taken by William Demant, and it is mainly based on regulations, such as the ROHS directive, Toys directive, the REACH candidate list etc. Substances are categorised in classes:

- Class I: Prohibited (not to be introduced in the production or be present in any products put on the market by the William Demant Group).
- Class II: Restricted (for restricted use only).
- Class III: Subjected to special deliberation (can be used, but under observation).
- Class IV: Under observation (can be used after thorough risk assessment).

Working with restricted lists ensures full transparency on the use of hazardous substances and also ensures compliance with relevant directives, and it gives the manufacturers the opportunity to set the bar even higher than required or recommended by external standards.

Carbon Disclosure Project

In 2008, we joined the Carbon Disclosure Project (CDP) which gives us a means of measuring and recording our environmental footprint, and each year we submit CDP reports on corporate CO2 emissions and climate strategy. At the time of writing, there are no available data for the 2013 calendar year, but a look at the development from 2011 to 2012 reveals, according to our CDP reports, that emissions in the countries in which we manufacture our products have risen by 4% compared to a rise in revenue of 6%. CO2 emissions per employee are calculated at 3.16 tonnes per year, which is low for a manufacturing company even though it represents a small rise from 2011 to 2012. Actually, this emission level corresponds to the level in the financial industry. Electricity accounts for about 86% of corporate CO2 emissions, the heating of buildings for about 7% and company cars for about 7%.

Principle 9: "Encourage the development and diffusion of environmentally friendly technologies"

Energy consumption

In terms of the environment, being responsible means acting both globally and locally, and having the right attitude. We constantly try to do better in this field.

By way of example, we have ambitious goals regarding IT infrastructure: We aim to lower the energy consumption to a third on running our server infrastructure in the local sales companies where refurbished. Actually, our efforts in this area have given rise to savings by as much as 5:1 in optimal scenarios. Further ore, replacing hardware with more energy efficient models has been a focus area.

Also, within the IT area, process optimisations have ensured that capacity planning is carried out more efficiently, reducing overcapacity, lowering overall energy consumption.

Initiatives have been taken to further consolidate services centrally on larger data centres, where cooling systems and backend environments are better utilised and specialised for leaner running. With the new data centre old, power consuming servers have been shut down and replaced with more energy efficient servers, and vendors of IT services are committed to a green approach, securing a responsible supply chain in this area. The approach is global – thus, asides from headquarter activities in Denmark, we have replaced all hardware at our operations in Bern, Switzerland, and in Brazil 10 old servers in a Storage Area Network (SAN) have been shut down and replaced by one single server and a new SAN. All these initiatives bring the power utilisation even further down on hosting applications, adding less footprint on energy consumption when more services are added.

Marketing materials

In many ways we aim to act responsibly regarding our environmental awareness. A concrete example of this is a packaging project on the substantial NHS market (National Health Service in UK). Here, we have reduced the use of paper in the Instruction For Use by 70-75% due to a new format, removed metal staples, replaced plastic box by a paper version, and reduced its size by 25%.

Also, we continue to drive overall initiatives initiated in 2012 regarding printed marketing materials used to facilitate the sales process of each hearing aid. Reverting the ratio 70/30 of print/digital materials to 30/70 is still in process, printed proof impressions shall be reduced by 80%, use of chemicals (e.g. UV varnish) has been significantly reduced and is coming very close to elimination, and all printing companies on our list of vendors are certified according to acknowledged environmental standards delivering only FSC-labelled printed materials. FSC, Forest Stewardship Council, promotes environmentally appropriate, socially beneficial and economically viable management of the world's forests.

Offshore windmill farms

A large investment of DKK 1.7 billion made in early 2012 by the Oticon Foundation through William Demant Invest (WDI) should be mentioned in this report. A gigantic wind farm shall be erected off the German North Sea coast and from 2015, producing green electricity matching the consumption of 285,000 households. The wind farm is still under construction, project running on schedule with the first of the 77 foundations and transition pieces installed in the beginning of 2014. WDI's interest in the wind farm constitutes about 18%, and the corresponding production of green power will be more than five times the total corporate consumption of electricity. Once the wind farm has been erected, the investment in green power will make William Demant a very green enterprise almost overnight.

Most of the Group's energy consumption at global level is used for heating and cooling buildings, lighting and computers, networks etc., with just a small part devoted to producing corporate products. Our investment in wind energy is therefore completely in step with our increased focus over the past four or five years on further reducing the environmental impact of our energy consumption, which is already relatively low.

Anti-corruption

Principle 10: "Businesses should work against corruption in all its forms, including extortion and bribery."

We are convinced that our business can only flourish if based on sound business ethics. We develop innovative, high-quality products and our primary goal is for the users to benefit from our products. We therefore have no interest in supporting business conduct that contributes to distorting market mechanisms. William Demant has not been involved in any legal disputes or settlements on business ethics.

In 2010, we adopted a formal business ethics policy that applies to all Group companies. The policy outlines how we want to act and how we want to be perceived, when it comes to the ethical

aspects of doing business and interacting with customers. Specifically, the policy provides guidelines as to what is appropriate and inappropriate marketing, hospitality and other interaction with hearing healthcare professionals.

We do not offer, give, accept or receive bribery in any form and we discourage facilitation payments. Along these lines, it is important to note that situations where corruption is prevalent often occur in third-world countries in connection with public tenders and that these tenders represent

a very limited part of our total revenue. In fact, OECD countries account for approximately 90% of the market for hearing aids. By the nature of our business, challenges regarding corruption are thus extremely rare. Nevertheless, according to the policy, we have incorporated business ethics principles into contracts with third parties where relevant, and we have applied a set of principles to avoid misuse of payments and financial transactions.

Furthermore, we make an effort to communicate our business ethics to all our companies, thus making ethics a natural part of all manager meetings and internal training sessions.

Goals for the future

Special focus areas for the near future are general environmental initiatives. In the area of facility management, i.e. in connection with building and renovation projects, we will make an effort to ensure that we always choose the best solution, which means implementing environmentally friendly improvements.

Also, marketing will receive special attention in the near future. The project to reverse the print/on-line material ratio from 70/30 to 30/70 will continue, and new improvements will be made on an on-going basis.

On the labour side, project 'More female managers' will receive continued attention, partly because it is now included in the Danish legislation, partly because it is a long process which requires substantial efforts that touch upon many layers of the organisation to achieve this goal.

There is no doubt that our joining the Global Compact initiative, our participation in the Carbon Disclosure Project and our generally increased focus on communication on responsibility all testify to the fact that this work is a priority and will be continuously developed in future.

Focus areas	Corporate governance (Wil- liam Demant specific)	1. Human rights	2. Labour rights	3. Environmental protection	4. Anti-corruption
William Demant 14 principles	1. We maintain an accountable and efficient management structure. 2. We communicate in an open, transparent, impartial and timely manner with the stock market about the Group's strategy, objectives and risks. 3. We maintain adequate internal control mechanisms with a view to monitoring, managing and mitigating any material risks associated with our business.	4. We treat our employees with respect and dignity, encourage diversity and ensure fair treatment. 6. We provide a safe and healthy working environment where employees can perform to their full potential and where initiative is encouraged. 8. We strive to maintain good relations with neighbours and the surrounding society through involvement and open communication. 14. To benefit the users of our products is our primary goal. We therefore avoid actions that may influence business decisions to the disadvantage of the endusers.	5. We do not use and we prohibit the use of forced labour or child labour. 7. We recognise our employees' rights to freedom of association and collective bargaining.	9. We use materials efficiently and strive to optimise packaging as well as waste handling. 10. We limit the use of hazardous substances in products and processes. 11. We monitor our impact on the climate and aim to reduce our energy consumption.	12. We are committed to abide by the laws and regulations of the countries in which we operate. In the absence of adequate laws and regulations, we refer to recognised international standards and industry norms. 13. We work against bribery and other forms of corruption, both directly and indirectly through our business partners, and we strive to avoid facilitation payments.
Special attention/action	The Directors rely on the recommendations of corporate governance drawn up by The Committee for Corporate Governance in Denmark, updated August 2011.	Highlighted projects: 1. Oticon Foundation through Ida Institute: Tools to support people with hearing impairment in their process of recognition and treatment. Information about hearing loss to the general public. 2. Oticon Foundation through various projects – e.g. in the third world. Also, our suppliers' code of conduct includes criteria relating to human rights.	1. More female managers: Special focus with new legislation, policy and action plan for 2013 onwards. 2. Our suppliers' code of conduct includes criteria relating to labour rights.	Highlighted projects: 1. Restricted list initiative 2. Reduce printed marketing material 3. Reduce energy consumption through global IT server consolidation 4. Offshore windmill farm. Also, our suppliers' code of conduct includes criteria for the environment.	In general: Our suppliers' code of conduct includes criteria for anti-corruption. Business ethics policy.

Table: UN Global Compact CoP 2013

Focus areas	Corporate governance (Wil- liam Demant specific)	1. Human rights	2. Labour rights	3. Environmental protection	4. Anti-corruption
Results and goals	We have developed a comprehensive Statutory Report on Corporate Governance 2013, describing and reviewing the William Demant systems for corporate governance. We comply with 43 out of 49 recommendations from The Committee for Corporate Governance.	Re 1: Ida Institute aims to positively impact hearing-impaired persons and hearing care professionals around the world by making patient-centred care the core of hearing care practice, and by promoting research and education within the field of acoustic communication. Re 2: Projects in The Amazon and in South Africa, establishing local hearing clinics with the help of volunteers from local Oticon affiliates as well as social workers, specialists from universities, hospitals and audio clinics, primarily in The United States.	Re 1: More female managers: Increasing the number of female managers at all levels through four specific initiatives is a corporate goal. So far, ratio has increased from 11% to 18% from 2009 to 2013. Re 2: Suppliers' code of conduct: 237 suppliers of components and packaging have signed the code of conduct. About 90% of our total purchases are made through this group of suppliers. Based on the code, we carried through 24 CSR audits in 2013. No cooperation agreements were suspended due to deviations.	Re 1: In the William Demant restricted list initiative, substances are categorised in four classes, ensuring full transparency on the use of hazardous substances and ensuring compliance with relevant directives. Re 2: Packaging project reduced the use of paper in the Instruction For Use by 70-75% due to a new format, metal staples removed, plastic box replaced by a paper version, size reduced by 25%. Printed proof impressions reduced by 80%. All printed materials FSC-labelled. Pursuing goal: To reverse ratio between offand online material to 30% off-line and 70% on-line. Re 3: IT server consolidation: Energy savings by as much as 5:1 in optimal scenarios. Re 4. The William Demant share of the offshore windmill farm will from 2015 produce more than five times the total corporate consumption of electricity in green power.	237 suppliers of components and packaging have signed the code of conduct. About 90% of our total purchases are made through this group of suppliers. Based on the code, we carried through 24 CSR audits in 2013. No cooperation agreements were suspended due to deviations.

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