

Sustainability Report 2024

WE HELP THE WORLD LISTEN

sonion sound
innovation
partner





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About this report

This Sustainability Report covers the Sonion Group, and includes reporting on Danish Financial Statements Act sections 99a and 99d.

Sonion Holding A/S
CVR 39186837
Financial Year 1 Jan 2024–31 Dec 2024



CEO Letter

At Sonion, our vision remains steadfast, **“We help the world listen”**

We are reminded of the power of this vision and how it continues to shape our journey. For Sonion, 2024 was a landmark year where further business transformation was completed, a year marked by milestones that speak to the strength of our strategy, “Growing from a strong core”, and a year where we celebrated our 50th anniversary.

In 2024, we celebrated our 50th anniversary - a moment to honour our history, our current and previous colleagues, and our responsibility to the hearing health industry and the people who benefit from the products. During the past 50 years, Sonion has gone from being a “start-up” company in Roskilde to a strong performing industrial company with the ambition to shape the hearing health industry. In 2024, we made critical strategic decisions to position Sonion for long-term success, including the consol-

idation of our operations in the Philippines into our Vietnam sites. This move reflects our commitment to operational excellence, aligning our footprint with our vision for a more agile and impactful organization. The consolidation was critical for Sonion and a very complex transaction, which was successfully completed and carried out with strong engagement and dedication by the colleagues involved.

Our performance on environmental, social and governance, or just “ESG”, remains a central theme. In 2024, we retained our EcoVadis Bronze status, demonstrating our determination to sustainable practices while identifying opportunities to further improve. Our Science-Based Targets initiative (SBTi) commitment and its validation in October marked a significant milestone, solidifying our role in driving global climate action.

We also launched new Environment, Health, and Safety policies with specific targets addressing climate change, energy and water management, and the circular economy. These policies reinforce our responsibility to create a sustainable future while ensuring the health and well-being of our people and planet.

We were particularly proud to announce our employee engagement survey (EES) results of 83 - a clear reflection of the trust, dedication, and passion shared across our teams. This score places us well above industry benchmarks, underlining the strength of our culture and the unwavering commitment of our employees. Achieving this higher score is especially remarkable, given the significant changes we have had over the past few years. The exceptionally high response rate of 95%, is also a testament to the involved community we have at Sonion.

Our leadership ethos - rooted in personal growth, team empowerment, and leading by example, was further strengthened through leadership training and development initiatives in 2024. These efforts ensure that we continue to cultivate the kind of leaders who integrate our values and inspire excellence across the organization. We have an obligation to develop the next generation of leaders in Sonion through our Great Leadership Program – this will make Sonion even stronger in the future. As we enter 2025, we set our sights on further embedding sustainability throughout our value chain. We will focus on driving initiatives at our Vietnam sites to support our reduction targets and deepening our engagement with key suppliers to align with our ESG commitments.

To our customers, partners, and colleagues worldwide, thank you for being part of this journey. Your passion, innovation, and leadership continue to make a difference. As we look ahead, let us remain united by our purpose and inspired by the opportunities that lie before us.

Here's to listening, learning, leading - and growing together.

Christian Nielsen, CEO



Vision, Mission and Values

Our vision

“We help the world listen”

Our mission

“We build open innovation partnerships helping people listen – to each other, to their bodies, and to the world”

Our values

Future-focused. Supportive.
Responsible. Driven. Responsive.

Sonion in Brief

Sonion is a global leader in the design and manufacturing of components and solutions for hearing aids and for professional audio. Our purpose is expressed through our vision: **We help the world listen**

In May 2024, we celebrated our 50th anniversary. Sonion was founded in 1974 in Roskilde, Denmark, by two Danish entrepreneurs, and today, it has more than 6,000 employees worldwide. Over the years, the company has expanded significantly in both product range and global presence. Since September 2014, Sonion has been owned by Novo Holdings A/S.

Sonion develops advanced miniature components and solutions such as balanced armature receivers, microphones, and electromechanical components. Our cutting-edge acoustic and development knowledge has created unique solutions for hearing health and professional audio users.

Sonion is a key technology partner in the hearing health segment, advising on new

product designs for the world's leading hearing aid manufacturers. Sonion contributes with its extensive expertise in acoustic modelling and application engineering, as well as the design and manufacturing of components and solutions.

Sonion is also a core partner for the professional audio segment, focusing on developing and manufacturing innovative, high-quality acoustic solutions, including Balanced Armature receivers and Electrostatic tweeters. These products are used by professional musicians, audiophiles, and other users with a passion for sound in the Pro Audio and communications markets.



In May 2024,
we celebrated
our **50-year**
anniversary

Sonion is headquartered in Denmark and has had its manufacturing base in Asia for many years. In 2024, we consolidated our manufacturing sites in Vietnam, and our factory in the Philippines closed in April 2024.

Our R&D is centered around our office in the Netherlands and supported by engineering teams in Vietnam. Sonion also has smaller entities and representations in the US, Poland, and China. Globally, Sonion has ~6000 employees working together across all locations.

Sustainability Strategy and Targets

In 2024, Sonion's Environmental, Social, and Governance (ESG) performance was notable in several areas. We retained our EcoVadis Bronze status, demonstrating our commitment to sustainable business practices. Sonion's Science-Based Targets initiative (SBTi) commitment was also validated in October, reinforcing our role in global climate action.

Employee engagement at Sonion remained strong, with a survey score of 83, well above industry benchmarks, indicating high levels of employee trust and dedication. Leadership development was a key focus, and several initiatives were implemented to strengthen leadership competency and abilities through training and development.

Looking ahead, Sonion is focused on embedding sustainability throughout its value chain. This includes driving initiatives at our Vietnam sites to support our reduction targets and deepening engagement with key suppliers to align with our ESG commitments.

Strategically, Sonion has defined specific ESG programs and set internal goals to promote sustainability. These programs support the business strategy, with each initiative selected and prioritized based on its overall ESG contribution. Key materiality topics have been identified, and near and longer-term ESG targets have been set to focus our joint efforts.

At Sonion, we remain committed to its vision of helping the world listen, driven by passion, innovation, and leadership. We aim to continue to positively impact society by developing and supplying innovative products for hearing health devices, benefiting millions of users daily.

E
Environment

S
Social

G
Governmental

Human Capital
We facilitate diversity, inclusiveness, and engagement.

Hearing Health & Hearing Equity
We support non-discriminatory and affordable access to high-quality hearing health for everybody, improving people's physical and mental health and quality of life.

R&D and Innovation
We drive innovation by being creative and pioneering in developing products that bring value to our customers, consumers, and society with respect for our planet and securing our position in the market.

2024
Commit, Develop and Submit GHG targets to the SBTi for official validation - accomplished

2025
Reduce our scope 1-2 GHG emissions by 16% and scope 3 by 9 % with 2022 baseline

2027
Reduce our scope 1-2 GHG emissions by 26% and scope 3 by 16% with 2022 baseline

2030
Reduce our scope 1-2 GHG emissions by 42% and scope 3 by 25 % with 2022 baseline

2024
Employee Engagement Survey - EES score of 80+ - accomplished

2025
Employee Engagement Survey - EES score of min 80

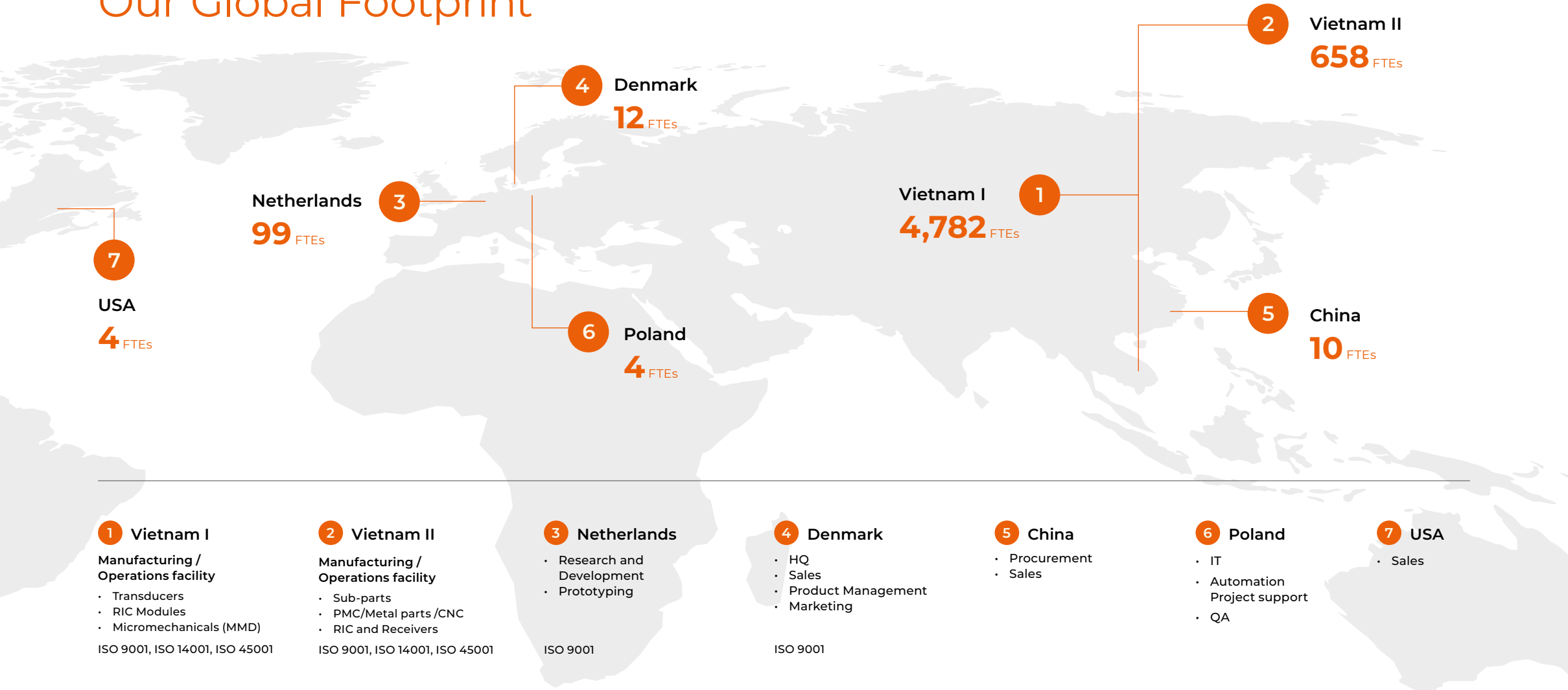
2027
>35% women in GMT and on the Board of Directors

2024
All suppliers (in scope) committed to our Supplier Code of Conduct - accomplished

2025
Engage with top 20 suppliers based on carbon emissions EcoVadis rating: SILVER

2027
Improving our EcoVadis rating

Our Global Footprint



General basis for preparation

BP-1

This Sustainability & ESG Report 2024 is aligned with the requirements of the EU's Corporate Sustainability Reporting Directive (CSRD) and European Sustainability Reporting Standards (ESRS) and covers the full financial year of Sonion Holding A/S from 1 January 2024 to 31 December 2024, including its controlled subsidiaries.

The structures and contents align with ESRS requirements and are prepared as a sustainability statement on a consolidated basis, covering our own operations as well as relevant and material upstream and downstream value chain activities.

Specific circumstances

BP-2

Any special circumstances relating to specific disclosures are reported in direct connection with the relevant disclosures.

In April 2024, we discontinued our operations in the Philippines and where relevant information pertaining directly to the performance and operations there has been included in this report, whereas any forward-looking analysis and assessments do not include this location.

The time horizons applied adhere to common financial and ESRS definitions unless otherwise specified directly in connection with disclosures where an alternative approach to time horizons is applied.

Restatements are determined based on a judgement of significance and are clearly indicated in connection with the restated data or information.

Estimates are used in exchange for incomplete or unavailable data, e.g. to provide group-wide reporting, and when used, the practice and scope are described in the applicable accounting policies, incl. assessment of any measurement uncertainty.

Changes are expected from year to year, considering the evolving nature of especially EU regulations and the process of phasing in certain disclosure requirements. Significant

changes or errors identified in the previous reporting period are described in the corresponding accounting policies or in the section covering the topic.



Sustainability Governance

GOV-1

In Sonion, to ensure commitment and representation across the business, the CEO is responsible for ESG and sustainability, supported by the Sonion ESG Committee and the Head of Compliance. This structure helps to ensure that our ESG strategy is consistent with and supports the overall Sonion ESG and sustainability agenda and related targets, as well as our business strategy.

We have an ESG Committee that is a cross-functional senior management committee chaired by the CEO and with relevant department representatives, including the Chief Technology and Innovation Officer (CTIO), SVP Operations, SVP Finance and SVP General Counsel & Head of Compliance. It is responsible for developing and implementing Sonion's ESG strategy and ensuring collaboration with internal and external stakeholders with a continuous focus on Sonion's ongoing commitment to reducing environmental impacts, promoting health and safety, corporate social responsibility, corporate governance and sustainability in broader terms. Oversight and assessment of Impacts, Risks and Opportunities is anchored in the ESG Committee.

The Head of Compliance attends the Board Meetings and reports on sustainability-related issues that require the attention of the Board of Directors, including the status of the ESG strategy, related initiatives and statutory reporting.

The Board of Directors oversees the ESG agenda and approves the annual ESG report and targets, as well as key policies, and reviews the company Double Materiality Assessment and identified Impacts, Risks and Opportunities. Our board comprises two independent and five non-independent board members in a two-tier setup where no person serves both on the board and within the company. We have a diverse board with different nationalities and backgrounds, and regarding gender diversity, we have 29% women on the board (2 of a total of 7).

Our implemented structures and roles enable us to navigate sustainability matters and related Impacts, Risks and Opportunities efficiently, and specific expertise can be found in the profiles on pages 11-14. As relevant to the complexity of the sustainability matters we address, we collaborate with external experts to support our opera-

Sustainability Governance Model



tional and strategic needs to ensure that we manage the topics in an efficient way, and implement ways of working into our business processes.

Standards and frameworks

Sonion supports the UN Global Compact Principles, the UN initiative to promote ethical business practices. The Sustainability Statements in this report constitute Sonion's communication on progress to the United Nations Global Compact. As a participant since 2023, we are committed to observing the Global Compact's ten fundamental principles in the areas of human rights, labor standards, environmental protection and anti-corruption.

In 2024, Sonion sustained the Bronze medal from EcoVadis. EcoVadis is the world's most trusted provider of business sustainability ratings. Global supply chains, financial institutions, and public organizations rely on EcoVadis to monitor and improve the sustainability performance of their businesses and trading partners. We will submit our reassessment in March 2025 and continue striving to improve our rating.

In our locations with significant operations, we maintain certifications for the management systems we have implemented. These are for quality management (ISO 9001), environmental management (ISO 14001), and for health and safety (ISO 45001). The certificates are available on our website:

<https://www.sonion.com/about/quality-assurance/>



We support the UN Sustainable Development Goals and have selected the relevant SDGs to support our ESG strategy and targets:

Environmental:



Social:







Governance:



ESG frameworks and ratings



Board of Directors

	 <p>Piet Coelewij Chairman</p> <p>Year of birth: 1960 Nationality: Dutch</p>	 <p>Christian Salling Board Member</p> <p>Year of birth: 1973 Nationality: Danish</p>	 <p>Henrik Kjær Hansen Board Member</p> <p>Year of birth: 1976 Nationality: Danish</p>	 <p>Claus Steensen Sølje Board Member</p> <p>Year of birth: 1972 Nationality: Danish</p>
Independent member	Yes	No	No	Yes
Year joined Board	2021	2017	2022	2018
Educational background	<ul style="list-style-type: none"> • MBA Rotterdam School of Management • BA Psychology University of Leiden 	<ul style="list-style-type: none"> • Master of Science from the Technical University of Denmark 	<ul style="list-style-type: none"> • BSc. in Business Administration and MSc. in Applied Economics and Finance from the Copenhagen Business School 	<ul style="list-style-type: none"> • Master's degree in Economics from University of Copenhagen, Denmark (1999). • High Performance Boards Program from IMD, Switzerland (2020)
Professional background	<p>Currently</p> <ul style="list-style-type: none"> • Chairman Sonion Holding A/S • Non-executive director Bas World BV • Non-executive director Royal Flora Holland BV • Non-executive director Jumbe Supermarkets BV • Non-executive director Interparking SA • Chairman Advisory board Econowind BV <p>Has previously held executive positions at Wehkamp BV, Sonos Inc, Amazon.com and Philips Electronics.</p>	<p>Currently</p> <ul style="list-style-type: none"> • Non-Executive Director Sonion Holding A/S • Senior Partner at Novo Holdings <p>Prior to joining Novo Holdings, Christian was employed as a Principal in A.T. Kearney's global health practice, working with strategy, M&A, and commercial & operational excellence across the MedTech & Pharmaceutical industries. Other previous employments include a position as Senior Vice President, Emerging Markets with Coloplast A/S</p>	<p>Currently</p> <ul style="list-style-type: none"> • Non-Executive Director Sonion Holding A/S • Senior Partner at Novo Holdings <p>Prior to joining Novo Holdings A/S, Henrik was employed as a Senior Vice President at Moelis & Co. in London, focusing on healthcare buy-and sell-side M&A transactions. Other previous employments include Deutsche Bank and ABN AMRO, all in London.</p>	<p>Currently</p> <ul style="list-style-type: none"> • CFO at ALK-Abello A/S • Non-executive director (board member) and member of the RemNomCo at Sonion Holding A/S • Non-executive director (board member) at UV Medico A/S <p>Has held a long list of international CFO and senior leadership positions in Novo Nordisk throughout the last 20 years.</p>
Other Board and executive roles	<ul style="list-style-type: none"> • Guest lecturer Insead (Leading AI and digital transformation) • Member Innovation Committee, Grupo Brisa SA 	Board member at: Ellab	Board member at: Xellia Ellab WCG Availity Liita care	
Competencies	Strong international experience in Digital businesses, Electronics, Infrastructure and Sustainability.	Management: BOD, Sales, Strategy, M&A Sustainability: ESG committee work Other: Commercial & Operational, M&A	Management, Sustainability. Other: Financial background with experience within M&A, capital markets, BoD, and audit committees	Management experience from across the value chain and functional areas like leadership, strategy, finance, commercial, procurement, supply chain, digital, data, IT, compliance/risk, business development and ESG.

Board of Directors



Verena Vescoli
Board Member

Year of birth: 1970
Nationality: Italian



Mikael Worning
Board Member

Year of birth: 1962
Nationality: Danish



Marlou Janssen-Counotte
Board Member

Year of birth: 1965
Nationality: Dutch

Independent member	Yes	Yes	Yes
Year joined Board	2021	2022	2024
Educational background	<ul style="list-style-type: none"> PhD Solid State Physics, ETH Zurich, Switzerland DEA University de Franche-Comte, France 	<ul style="list-style-type: none"> Cand. Polit, University of Copenhagen, Denmark 	<ul style="list-style-type: none"> Degree in Hotel Management and Marketing
Professional background	<p>Currently</p> <ul style="list-style-type: none"> Non-Executive Director Sonion Holding A/S Chief Technology Officer LEM Holding SA <p>Has previously held executive positions at ams OSRAM, ams AG and AVL.</p>	<p>Currently</p> <ul style="list-style-type: none"> Chairman Cellavision AB, including Audit Committee Chairman Tandlæge.dk Chairman Qufora A/S Non-executive director Sonion Holding A/S Non-executive director Snakker.io Board Observer Lucid LLC <p>Has previously held executive positions at B&O Tech-nology, Oticon A/S and Demant Inc.</p>	<p>Currently</p> <ul style="list-style-type: none"> Non-Executive Director Sonion Holding A/S Non-Executive director Inspiration Health Care Group PLC Non – Executive director Acarix AB Board Member Field Medical Inc. Board Member EBAMED SA <p>Has previously held Senior MedTech Executive positions as Vice President, President, General Manager in large- and medium-sized organizations such as Philips, Biotronik, St. Jude Medical and Medtronic.</p>
Other Board and executive roles	<ul style="list-style-type: none"> Board member at OSRAM Licht AG Board member at OSRAM GmbH Advisory Board Fraunhofer IISB 	<ul style="list-style-type: none"> Board member Danish Technical University POC board Industrial advisor Impilo AB 	<ul style="list-style-type: none"> Senior Advisor to Vektor Medical Inc.
Competencies	Over 25 years of international experience in leading R&D/Innovation and Technology with a focus on Semiconductors and Electronics/ Sensors for Automotive, Medical, Industrial and Consumer applications.	Strong international experience in MedTech within diagnostics, implants, hearing aids and medical retail services. Combined with board work in companies such as Ambu and 3Shape.	Management: General Management, Strategic Business Planning, Product development & Launch, Sales and Marketing Strategies Other: New Business Development, Digital Transformation Clinical Research, Partnerships and Strategic alliances, M&A Seasoned board member with strong business acumen and extensive understanding of healthcare markets, delivering value-based customer-focused medical solutions across worldwide regions.

Sonion Management Team



Christian Nielsen
President & CEO

Year of birth: 1962
Nationality: Danish



Andreas Loibnegger
Chief Technology
Innovation Officer

Year of birth: 1975
Nationality: Austrian



Jason King
Senior Vice-President
Operations & General
Director

Year of birth: 1968
Nationality: British

Year joined Sonion	2011	2020	2017
Educational background	<ul style="list-style-type: none"> • MSc. Economics and BA, University of Southern Denmark • HD, Graduate Diploma in Business Administration, Copenhagen Business School • MBA Executive at INSEAD 	<ul style="list-style-type: none"> • Mechanical Engineering degree from HTL Wolfsberg, Austria • Executive MBA Wharton Business School, US 	<ul style="list-style-type: none"> • MSC in Manufacturing Systems from Birmingham University, UK • BEng (Hons) in Electrical & Electronic Engineering from Portsmouth University, UK
Competencies	<p>Christian Nielsen is as CEO responsible for the whole Sonion group of companies.</p> <p>Christian Nielsen has 30 years of business experience from different industries, such as shipping, logistics, distribution, as well as FMCG, and has the last 14 years been working in the medical industry. Christian Nielsen possesses a solid track record in leading and developing complex and international companies.</p>	<p>Andreas is end-to-end responsible for the global Research & Development activities. This includes resource & budget allocation, technology & product development, industrialization, portfolio management, open innovation and intellectual property management.</p> <p>Andreas has 25 years of international experience in Research & Development, Innovation and engineering management in the medical and consumer sectors. He has lived and worked for several years in the USA, Southeast Asia, and Europe for companies with a global presence.</p>	<p>Jason is responsible for Operations, with two factory locations in Vietnam, plus resources in Europe and China supporting Sonion's global Customers.</p> <p>Jason has more than 30 years in management roles and has been living & working in SE Asia since 2007. He is responsible for in-house manufacturing and global supply chain partners and drives continuous improvement in all elements of the Operations strategy.</p>

Sonion Management Team



Kim Vorbeck Jans
Senior Vice-President
Finance

Year of birth: 1975
Nationality: Danish



Mette Boje-Larsen
Senior Vice-President
General Counsel & Head
of Compliance

Year of birth: 1966
Nationality: Danish



Niels Schneider Gregersen
Vice-President, Product
Management & Strategy

Year of birth: 1987
Nationality: Danish

Year joined Sonion	2011	2019	2017
Educational background	<ul style="list-style-type: none"> • Master's degree in Business Economics and Auditing from Copenhagen Business School • Master's degree in Business Administration and Finance from Copenhagen Business School • State Authorized Public Accountant 	<ul style="list-style-type: none"> • Master's degree in Law (Cand. Jur), University of Copenhagen • LLM in International Business Law, University of Kent • Postgraduate Degree, European Competition Law, King's College London 	<ul style="list-style-type: none"> • International Master of Science in Quantitative Economics, University of Aarhus
Competencies	<p>Kim is responsible for Finance for the whole Sonion group of companies.</p> <p>Kim has financial and management experience from the electronics and information technology industries. Kim has previously worked as an accountant at EY servicing a broad portfolio of small and medium-sized companies.</p>	<p>Mette is responsible for legal and compliance, including ESG group reporting.</p> <p>Mette has worked as a qualified Danish lawyer and has over 20 years of experience as an in-house counsel in the electronics industry, working for companies with a global presence. Mette has extensive experience working with compliance and driving the ESG and sustainability agenda.</p>	<p>Niels is responsible for Product Management & Strategy, including the commercialization and financial viability of innovation, executing the go-to-market model and allocation of resources in collaboration with R&D.</p> <p>Niels has past experience in management consulting, with exposure to both the public and private sectors, and in particular, financial services and telecom.</p>

Sustainability management

GOV-2

The structures outlined in the previous section have been operational for the past two years, and we have effectively been using this structure to ensure awareness, reporting, target setting and business progress on prioritized sustainability matters.

Our Board meets five times each year, as a minimum, and at four of these meetings sustainability and ESG is on the agenda to ensure updates and any required decision-making, such as approving of annual reporting, setting targets, or approving policies.

The ESG Committee meets at least six times yearly to oversee progress, review status, and ensure adequate priorities for required actions and business needs.

In 2024, we conducted our first Double Materiality Assessment in accordance with the requirements of the ESRS, building on the assessments of previous years. The outcome, incl. Impacts, Risks and Opportunities, was presented and discussed within the ESG Committee and the full Management Team, as well as the Board, all during September 2024.

The full status of the year is presented in the form of the annual ESG report, which includes the implementation of due diligence and the effectiveness of policies, actions, metrics, and targets. During the year, the Board was, in particular, kept updated on climate actions and the progress of establishing Science-Based Targets for greenhouse gas emissions, as well as on the process of conducting the Double Materiality Assessment, including its approach and related outcomes.

Integration of sustainability-related performance in our incentive schemes

GOV-3

The long-term incentive scheme (MIP - Management Incentive Program) for the Sonion Management Team includes sustainability-related performance. The targets reward the achievement of annual progress towards Sonion's science-based emissions reduction targets.

The short-term incentive scheme (STIP - Short-Term Incentive Program) for the entire organisation includes financial, commercial and operational targets. For the Management and the Operations teams at our facilities in Vietnam, the STIP includes targets to reward ESG progress and implementation of Sonion's strategic sustainability targets.



Statement on due diligence

GOV-4

The following table outlines where in the statement we have disclosed our current practices on implementing and conducting aspects and steps of sustainability due diligence.

Core elements of due diligence	Paragraphs in the Sustainability Report
a) Embedding due diligence in governance, strategy and business model	GOV-1 Sustainability governance GOV-2 Sustainability management GOV-3 Incentive schemes
b) Engaging with affected stakeholders in all key steps of the due diligence	SBM-2 Interests and views of stakeholders
c) Identifying and assessing adverse impacts	GOV-1 Sustainability Governance GOV-2 Sustainability management SBM-3 Impacts, risks and opportunities IRO-1 Double Materiality Assessment, incl. Environmental IRO-1 S1-2, S2-2, S4-2 Processes for engaging with stakeholders S1-3, S2-3, S4-3 Processes to remediate negative impacts
d) Taking actions to address those adverse impacts	E1-1 Transition plan for climate change E1-3, E2-2, E3-2, E5-2 Actions and resources S1-4, S2-4, S4-4 Actions and resources G1-1 Compliance training, Whistleblower Line G1-2 Management of relationship with suppliers G1-3 Prevention and detection of corruption and bribery
e) Tracking the effectiveness of these efforts and communicating	GOV-2 Sustainability management GOV-3 Incentive schemes E1-1 Transition plan for climate change E1-4, S1-5 Targets G1-4 Incidents of corruption and whistleblower cases

Risk management and controls over sustainability reporting

GOV-5

Sonion's sustainability reporting is exposed to risks of material misstatement due to human error, incomplete data or negligence. We have implemented several mitigating actions to manage this risk:

- Well-defined ESG governance and general business structures
- Accounting policies and underlying reporting processes
- Engaging with subject matter experts on the most complex topics

Any identified issues are addressed in the ESG Committee and, if significant, reported to the Board of Directors.



Strategy, business model and value chain

SBM-1

Business and sustainability strategy

In the following section we will describe our business model and value chain. A general description of our strategy is provided in the Sustainability Strategy and Targets section on page 6.

Key resources

Our key resources result from over 50 years of experience in the hearing and audio business.

It is supported by our ownership, heritage, and long history of fostering a culture of innovation and operational excellence. Together, this has created a unique and strong position for Sonion in the market.

Our resources are evolving dynamically, driven by our ability to lead, adapt our capacity and operations to customer needs and expectations, and supported by our employees' loyalty and engagement.

As a Danish-owned business with employees in Asia, US and Europe, managing our business with a strong purpose and values is essential to our success. This guides our leadership and employees to act and make decisions that

further develop our customer relations and market success.

Core business – our products

Sonion develops the core components used by hearing aids and professional audio. Our products include microphones, receivers, connector systems, and coils. We manufacture more than 4000 unique components. We work closely with hearing aid manufacturers to customize and design components that work optimally with their software and hardware designs.

In the professional audio market, we are a close partner with the manufacturers of professional-grade earphones called In-Ear Monitors (IEM). IEMs are used by music professionals on stage, in broadcasting studios, concert halls, houses of worship, etc.

We work closely with these manufacturers to design the sound signature and select the appropriate speakers (receivers) to achieve the desired performance of the earphone. We often assemble modules of several speakers to ensure sound quality and ease the manufacturing of the earphone.

Innovation

Innovation and its positive impact for our customers and end-users are at the center of all our activities at Sonion.

We design, develop and manufacture small, energy-efficient micro-acoustic components including microphones and balanced armature receivers that enable millions of people to hear and communicate.

At our main R&D site in the Netherlands, we achieve our innovations with a diverse workforce from twenty-one different nations. At Sonion, we focus on learning and building relationships with local universities through our internship program, and talented students constantly support us in our innovation projects.

Our products are often developed in close collaboration with our customers. This helps ensure that the desired value proposition is achieved and that the end-user gains the hearing care benefits that we and our customers intend. Our R&D engineers in the Netherlands and Vietnam work in project teams with our customers' R&D teams to develop the optimal technical solutions.

The creation of intellectual property is essential for us to ensure long-term sustainable investments in innovation. When relevant, we patent our technologies and innovation to ensure we can deliver value to our customers and, ultimately, the end-users. We research how our products impact the end-users and hearing care professionals to understand their needs, objectives, and challenges.

We take ownership of our role in the value chain of hearing health, as we contribute with our highly energy-efficient designs to sustain longer wearing time for hearing aid users and help reduce the number of recharge cycles. With our enhanced focus on sustainability, we also constantly drive for miniaturization and efficiency in our manufacturing. In the early design phases, we do design for manufacturing reviews with a focus on limiting manufacturing processes, the use of materials (steel, plastic, etc.) and parts needed without compromising the quality or reliability of our products.

Business Model



Value creation

We have a balanced focus on creating value for all of our stakeholders. First of all, we are in business to improve the quality of life for people with hearing loss. We do so through the high-quality solutions we provide to our customers, the hearing aid manufacturers, who provide hearing care for the end users. By doing so, we create jobs, build competencies, and grow people to innovate and perform in their jobs. Our business contributes broadly to society and the communities we are a part of, through the jobs we create and the participation in local events. We provide a return on investment for our owners, we assure a license to operate, and we strengthen our ability to grow in a responsible way.

Our Value Chain

In Sonion, we are focused on the environmental, climate and social impacts throughout our entire value chain, from raw material extraction and our suppliers upstream over our own production of parts and components, which we deliver down-

stream to our customers and, finally, the users of hearing aids. We collaborate with suppliers, customers, and other partners to develop and manufacture our products effectively, increasingly integrating environmental and climate considerations

and social responsibility into our full value chain.

Upstream, Sonion is mainly a smaller business partner with limited leverage towards its suppliers, while the market that Sonion

services and the downstream aspects are characterized by a handful of major manufacturers that market their hearing aids through their own retail channels and directly to healthcare organizations.



Interests and views of stakeholders

SBM-2

Engaging with stakeholders is essential to our ability to create value and our vision: We help the world listen. Understanding the views and interests of key stakeholders informs our strategy and business model, enables the right target-setting, and supports that we identify activities that can make our operations more sustainable.

How we operate the business and ensure ongoing dialogue with key stakeholders gives us strong insights across sustainability matters.

We have a close dialogue with especially our key customers to ensure alignment with their needs and assessments while we continue to observe and also push for further sustainability maturity in our upstream relations.

The Management Team is updated on an ongoing basis about key insights and risks, as deemed necessary by the team members responsible for the engagements. In a more formal format, this is planned and presented to the Management Team and the Board as considered relevant as part of the annual Double Materiality Assessment review and approval process.

Stakeholders	Engagement types	Purpose	Frequency
Employees	Engagement survey	Include views and perspectives	Annually
	H&S management, and workplace assessments	Ensure attractive workplace	Ongoing
Customers	Operational dialog	Ensuring performance	Daily
	Ongoing collaborations	Identifying optimizations	Ongoing, projects
Suppliers	Supplier Sustainability Compliance requirement	Ensure compliance, ethics	Ongoing, during contracting
	Onsite and desktop audits, incl. for conflict minerals	Verify performance	Planned over the year
		Map maturity	Selected suppliers, ad hoc
	EcoVadis assessments	Monitor potential issues	In connection with DMA
Owners		Impact/risk analysis	
	Board meetings and updates	Alignment on strategies, targets and performance	During the year, and annually for full year
Regulators	Monitor developments	Ensuring compliance	Ongoing



Impacts, risks and opportunities

SBM-3

As a manufacturing company, and even though our own processes are low impact, we have a significant positive global footprint because of our importance to the global hearing aid industry, but also related negative impacts and potential impacts deriving from our materials consumption, needed transportation and the general nature of our operational footprint.

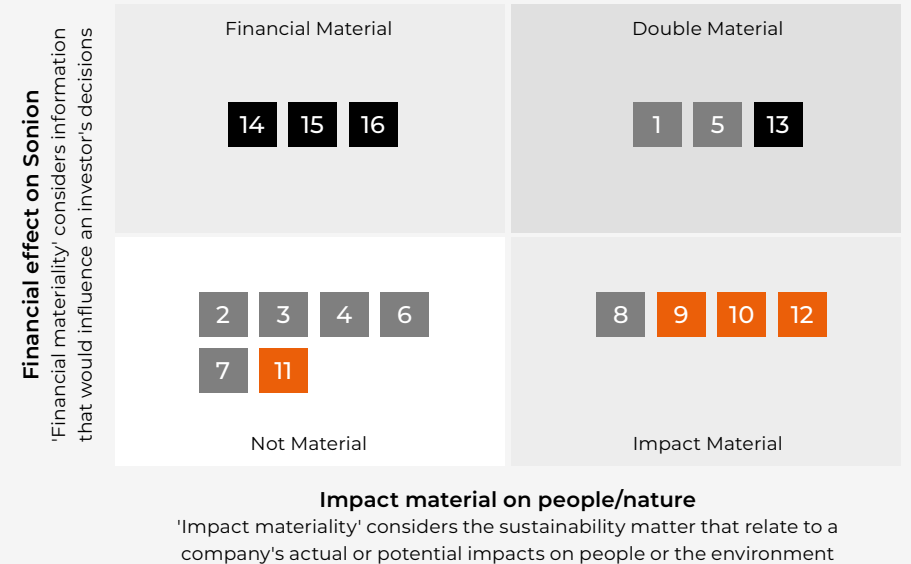
Many sustainability matters are relevant to consider when we run and manage our business, and our focused double materiality assessment in 2024 further underlined this when we built on previous years' materiality assessments. The specific Impacts, Risks and Opportunities are described within each topical standard section. In addition to sustainability matters defined in the ESRs, we have identified a number of entity specific that have related potential risks associated with them and that we report on in the G1 section.

For some years, we have had our ESG needs and opportunities integrated into our strategy and operations, and very naturally for the positive impact our products have for the end-users. We invest in inventing

new positive solutions and attributes that end-users benefit from and have, in recent years, put strong efforts into managing climate change, specifically through carbon accounting and optimization and customer dialogue and collaborations, with an aim to bring down the overall footprint throughout the value chain.

Following our 2024 commitment to adhere to SBTi and reduce our carbon footprint in the years to come, we know this is an area of continued investment in optimizing our operations, materials inflow and related processes.

When we consider the full overview of identified impacts, none are assessed to have a high likelihood or high expected severity, but we believe that it is relevant and critical that we continue and optimize the measures we have in place to continue efficient mitigations. This also means that we do not anticipate any potential impacts that we have reason to believe would materialize specifically within our operational control in the years to come.



■ Environment ■ Social ■ Governance

- | | |
|---|--|
| ■ 1. Climate Change (footprint implications) | ■ 9. Own workforce |
| ■ 2. Climate Change - Chronic Hazards (e.g. soil erosion) | ■ 10. Workers in the value chain |
| ■ 3. Climate Change - Acute Hazards (e.g. floods, storms) | ■ 11. Affected communities |
| ■ 4. Climate Change - Transition events (e.g. CO ₂ tax, customer requirements) | ■ 12. Consumers and end-users |
| ■ 5. Pollution (emissions, and substances) | ■ 13. Business conduct (culture, corruption, lobbying) |
| ■ 6. Water and marine resources | ■ 14. Cyber attack |
| ■ 7. Biodiversity and ecosystems | ■ 15. Business compliance (tax, trade/sanctions, competition, confidentiality) |
| ■ 8. Resource use and circular economy | ■ 16. Supply chain disruption (e.g. Suez Canal incident, war) |

Double Materiality Assessment

IRO-1

Our first full Double Materiality Assessment was supported by the efforts and progress achieved in previous years, including the related analysis and our pre-existing ESG reporting.

We defined the approach to involve key colleagues, including the full Management Team and representatives from the local environmental, health & safety, HR, IT and supply chain teams. Through interviews and workshops during Q2 2024 with our external sustainability advisor, many employees contributed to assess and discuss the topics defined in the ESRS and additional topics relevant to our business.

The meetings and assessments were based on prior analysis of markets, geographies, customers and suppliers, using relevant tools and external publications to supplement strong in-house knowledge and experiences. Based on this, the detailed assessment of relevant Impacts, Risks and Opportunities was undertaken by the Head of Compliance and the Quality Assurance Director and established in August 2024 ahead of the coming months' meetings for review and approvals.

The full value chain of Sonion was evaluated during the process, but with special attention to its own operation and directly relevant and addressable topics.

The methodology applied was established in full alignment with the requirements of the ESRS, assessing

- negative impacts based on their relative severity and likelihood,
- positive impacts based on their relative scale, scope and likelihood, and
- risks and opportunities based on their likelihood and potential financial effects

A common scoring method, using a 1-5 scale for the various parameters, was used to guide an adequate and documented evaluation to enable a sound assessment of each Impact, Risk and Opportunity. The 2024 Double Materiality Assessment was discussed and concluded at the September meetings of the ESG Committee, Management Team, and Board.

We expect to revise the assessment during Q3 2025 before next year's reporting.



Disclosure requirements covered by the sustainability statement

IRO-2

The following tables list all the disclosure requirements in ESRS 2 and topical standards that are material to our business. We have omitted all the disclosure requirements in the topical standards E4 Biodiversity and ecosystems as the Impacts, Risks and Opportunities identified for these matters are below our materiality thresholds. We report voluntarily on relevant contents of E3 Water and marine resources, and on S3 Affected communities in response to stakeholder interest, even though there are no identified Impacts, Risks or Opportunities for these topics. Further, we have identified entity specific topics, "Business Compliance" and "Cyber Risks and Data Protection", which we disclose as part of the Governance section.

The tables can be used to navigate to information relating to a specific disclosure requirement in the sustainability statements.

In cases where we do not yet have any information related to a disclosure requirement, no reference is made.

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Our ESG and sustainability-related policies

Policy	Area of application	Description	Accountability
Code of Conduct	Overarching	Our values and the guidelines for making ethical decisions that all employees are expected to follow.	Management Team
Supplier Sustainability Compliance	Overarching	Our expectations to our suppliers and business partners to conduct business ethically and legally and follow sustainable business practices.	SVP Operations
Environmental Policy	Environment	Our commitment and responsibility for the environmental and climate impacts of our business activities and in our value chain.	Management Team
Diversity, Equity and Inclusion Policy	Social	Our commitment to diversity, equity, and inclusion, founded on our company values.	Management Team
People and Labor Policy	Social	Our human rights and labor standards to which all employees are entitled, irrespective of the country in which they work.	Management Team
Health and Safety Policy	Social	Our commitment and guidelines for health and safety for all our employees.	Management Team
Human Rights Policy	Social	Our commitment to support and respect human rights for all people including acting in compliance with laws on freedom of association, as well as laws prohibiting forced, compulsory and child labor, human trafficking, and discrimination.	Management Team
Conflicts Minerals Policy	Social	Our commitment to responsibly sourcing minerals, specifically tin, tantalum, tungsten and gold, to avoid supporting conflict or human rights abuses in conflict-affected and high-risk areas.	SVP Operations
Anti-bribery Policy	Governance	Our commitment to ensuring that our business is conducted lawfully without using corrupt practices or acts of bribery to obtain an unfair advantage.	General Counsel
Data Ethics Policy	Governance	Our data ethical principles and how we legally and ethically process information and data about individual persons.	General Counsel
Whistleblower Policy	Governance	How to report suspected misconduct, how reports are handled and our commitment to ensuring that any individual who, in good faith, reports misconduct or violations will not experience retaliation against themselves or others.	General Counsel

Our sustainability efforts at Sonion are guided by our group-level policies, which outline our commitments and management approach.

Our policies are developed at group level and approved by our management team. These policies ensure that our employees in different regions adhere to the same core principles despite different local regulations. To ensure

effective implementation, all relevant policies are translated into local languages and published internally and on our website: <https://www.sonion.com/about/esg/>

Relevant employees are regularly trained on the policies via online training systems and face-to-face training as part of our onboarding program.

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Sonion is dedicated to reducing our environmental impact. We recognize the importance of utilizing energy, water, and other resources efficiently and are committed to implementing strategies to minimize our impact on the environment. We are committed to addressing climate change by reducing greenhouse gas (GHG) emissions.

Climate Change

Sonion is committed to addressing climate change by reducing greenhouse gas (GHG) emissions. As of 2022, we update our corporate-level inventory of Scope 1, Scope 2, and Scope 3 emissions on an annual basis. We have established 2022 as our base year, being a clear starting point from which we track our progress, explore strategies for reducing emissions, and collaborate with stakeholders to develop effective decarbonization strategies over time.

E1 - Climate Change

Topic	Description		Value chain			Time horizon		
			Upstream	Own operation	Downstream	Short	Medium	Long
Climate impacts in the value chain	Certain sectors in our value chain account for a large carbon footprint which impacts our climate, even though our related share is relatively small considering the amounts of materials purchased over a year	Actual negative impact	■		■	■	■	■
Climate impacts from own operations	Emissions from own operations impact the climate	Actual negative impact		■		■	■	■
Climate action ownership/ investments	Efforts to reduce emissions in own operations and the value chain requiring significant funding/resources	Risk	■	■		■	■	■
Energy use (dependency)	Energy is critical to manufacturing, even as a non-heavy industry manufacturer	Risk		■		■	■	■

Transition plan for climate change

E1-1

Science Based Targets initiative

In 2024, Sonion joined the ambitious climate action movement by setting near-term emissions reduction targets according to the Science Based Targets initiative (SBTi). We have developed and submitted the near-term targets in line with the latest SBTi criteria for emissions reduction, according to the SBTi Criteria released in March 2024.

By 2030, we plan to reduce our Scope 1+2 emissions by 42% and our Scope 3 emissions by 25%. The coverage of reductions that Sonion intend to address is at least 95% of Scope 1+2 and at least 67% of Scope 3 emissions.

We intend to work closely with all key stakeholders to identify impactful decarbonization initiatives throughout our supply chain. In Q4 2024, we onboarded a dedicated Supplier Sustainability Specialist, who will start engaging with top suppliers as of 2025, by building their capacity on sustainability and aligning decarbonization plans.

We have identified opportunities to further increase efficiency in energy consumption in our manufacturing processes. In 2025, we plan to review the packaging of our purchased materials and finished goods and start working on optimizations with our suppliers and customers.

Material impacts, risks and opportunities and their interaction with strategy and business model

ESRS 2 SBM-3

As part of our DMA conducted in 2024, we identified the following Impacts, Risks and Opportunities related to climate change. The

identified IROs apply across our geographies and are generally more concentrated in our operation sites in Vietnam.



Processes to identify and assess impacts, risks and opportunities

ESRS 2 IRO-1

In connection with our overall DMA process, we conducted an environmental analysis, using bespoke tools to assess any climate and biodiversity risks. This provided us with a solid understanding of our current situation, and we discussed and evaluated whether scenarios for the future would further expose risks to our business, including activities and assets. Using this basic scenario-like analysis method, we have not identified any significant future risks beyond what we report now. We also analyzed 18 key suppliers, see section G1-2.

As part of the DMA and related analysis, we considered the climate-related hazards and climate-related transition events listed in the climate change application requirements of the ESRS. We also reviewed our locations for risk of negative impacts on biodiversity, concluding that no such risks are likely to happen, considering our operations, proximity to protected sites and likely scenarios for accidents or spills in our own operations.

Going forward, we are committed to continuing to monitor potential risks to our business.

Policies

E1-2

In 2024, we released a new Environmental Policy, and we acknowledge that we are responsible for the environmental and climate impacts of our business activities and our value chain. Sonion is committed to addressing climate change by reducing greenhouse gas (GHG) emissions. We recognize the importance of efficiently utilizing energy, water, and other resources and are committed to implementing strategies to minimize our environmental impact. We follow all applicable environmental laws to protect people and the environment from any negative impact. Sonion is committed to protecting the environment and integrating environmental considerations into all our business practices. We promote environmentally sound and sustainable practices to prevent pollution and comply with environmental laws and regulations, with the aim of minimizing the undesirable impacts of our operation on the environment and the communities in which we live and work.

Actions and resources

E1-3

Our Operations' environmental footprint

At our manufacturing sites in Vietnam, we prioritize energy and water conservation, waste reduction, and air quality monitoring. We regularly assess the air quality inside and outside the facilities and update our health and safety policies to maintain a safe and healthy work environment while minimizing the impact on the neighboring communities. We maintain regular noise level monitoring reports and submit them to local authorities to comply with environmental regulations, which also support creating a better working environment for our employees.

In Q2 2024, Sonion operations formally ceased in the Philippines, and the full exit has now been concluded. The full scope of the operations was transferred either to our factory locations in Vietnam or outsourced to partners.

As a consequence, we have increased the floor space utilization at our factory locations in Vietnam and taken action to extend our production footprint in a building located close to our main factory in Ho Chi Minh City (HCMC). This secures sufficient footprint to support the expected business growth in 2025/26.

Our application to build an extension to the factory located in HCMC is in progress, and we aim to conclude the building project before the end of 2026. The new building project will be designed/built in accordance with LEED (Leadership in Energy and Environmental Design) with the ambition of receiving certification.

Our primary operations sites (HCMC and Vung Tau) have successfully passed ISO 14001 surveillance audits in 2024, and we will extend our certification to cover the additional manufacturing location in HCMC during 2025. Maintaining compliance with the standard helps Sonion improve environmental performance in our operations, focus on environmental risk prevention and support the increase in efficiency of the resources we use.

Our supplier and customer relations

In 2024, with external support, we have delivered several Product Carbon Footprint results for selected products, following the Pathfinder Framework 2.0 methodology. We have received further PCF requests for 2025. We are, in parallel, working towards building internal capabilities to deliver PCF data as of 2026.

Our supplier engagement in 2024 focused on the top 20 suppliers through a carbon questionnaire. The results show that half of the top 20 suppliers do not yet have a GHG inventory established. In 2025, we will prioritize capacity building for these suppliers based on our estimates of their emissions contributing to Sonion's GHG Inventory Scope 3 category Purchased Goods and Services.

Sustainable energy in our Operations

We continue to utilize rooftop solar panels in Vung Tau operations, contributing to over 7% of the total electricity consumption of the site in 2024. Solar panel installation in Ho Chi Minh City encountered challenges, with the industrial park license process remaining the main reason for not completing the project as planned in 2024. We aim to finalize the installation of solar panels at our main facility in Ho Chi Minh City in 2025, which will contribute with approximately 10% of the site's electricity consumption. In addition, Sonion is monitoring the implementation of the Vietnamese Government's new law related to the Direct Power Purchase Agreement (DPPA) between a large electricity consumer and a renewable power generation company. The new law was adopted, but the implementation procedure has yet to be clarified during 2025.

Targets

E1-4

Our targets are aligned with the SBTi commitment, validated in 2024. By 2030, we plan to reduce our Scope 1+2 emissions by 42% and our Scope 3 emissions by 25%. The coverage of reductions that Sonion intend to address is at least 95% of Scope 1+2 and at least 67% of Scope 3 emissions.

As a result of this commitment, for 2025, we aim to engage with the top 20 suppliers, identified based on their top contribution to Sonion's Scope 3 emissions. In addition to building capacity on carbon emissions inventory, we intend to work with suppliers to increase the accuracy of carbon emissions attributed to Sonion's products through Product Carbon Footprint reporting. We also aim to align suppliers' decarbonization pathways with the ambitious SBTi commitments of the hearing industry.



Energy consumption and mix

E1-5

Energy

Energy consumption is a significant aspect of our operations, and we strive to manage it responsibly to minimize environmental impact and enhance operational efficiency. In 2024, Sonion's energy consumption indicates a shift towards energy conservation and energy efficiency, with a total consumption of 16,354,335 kilowatt-hours (kWh), reflecting a 13.03% decrease from 2023.

Non-renewable sources accounted for 90.43% of the total consumption, totaling 14,789,373 kWh, while renewable sources contributed 9.57%, totaling 1,564,962 kWh, including contributions from the rooftop solar panel installation in our Vung Tau factory and hydro-electric power plants in the Philippines.

The ratio of renewable energy usage has decreased because of the closure of the Sonion Philippines operations, which took effect at the end of June 2024, where the main source of electricity came from renewable sources, a local hydroelectric power plant. Despite these operational changes, Sonion remains committed to sustainability

Datapoint	Unit	2024	2023	Difference %
Fuel consumption from crude oil and petroleum products	MWh	549	741	-26%
Fuel consumption from natural gas	MWh	235	234	0.4%
Consumption of purchased or acquired electricity, heat, steam and cooling from non-renewable sources	MWh	14,006	13,030	+7%
Total non-renewable energy consumption	MWh	14,789	14,005	+5%
Share of non-renewable sources in total energy consumption	%	90%	74%	+21%
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	1,565	4,799	-68%
Total renewable energy consumption	MWh	1,565	4,799	-68%
Share of renewable sources in total energy consumption	%	10%	26%	-63%
Total energy consumptions	MWh	16,354	18,804	-13%

and will actively seek initiatives to increase renewable energy sources.

Our diesel usage decreased by 32%, totaling 78,398 kWh compared to 115,298 kWh in the previous year. The decrease in consumption is mainly attributed to minimal power interruptions, which require the operation of generators, and ceased operations in

the Philippines, which also used diesel for generators. The use of Liquefied Petroleum Gas (LPG) also decreased by 24%, totaling to 470,379kWh as compared to 625,583kWh from the previous year, mainly driven by the closure of Sonion Philippines operations and the decreased headcount.

Accounting policy

Non-renewable sources

Covers fuel consumption related to the group's car fleet, natural gas consumption related to heating office buildings in the Netherlands, canteen cooking LPG use, diesel generator use, and all purchased electricity of Vietnam sites, Philippines and the Netherlands.

Gross Scopes 1, 2, 3 and Total GHG emissions

E1-6

Corporate emissions inventory

In 2024, we conducted a thorough inventory of Scope 1-3 emissions according to the GHG Protocol. We have included all our major sites: manufacturing facilities in Vietnam and the Philippines and our R&D center in the Netherlands. Our total emissions for 2024 equal 28,521 tCO₂e location-based or 27,346 tCO₂e market-based. The 2024 emissions have decreased by 8% compared to the base year 2022 location-based and increased by 2% market-based.

Scope 1

Scope 1 emissions of 2024 were at 970 tCO₂e, responsible for 3% of overall Sonion emissions. The main contributors to these emissions are diesel and petrol for company vehicles, LPG for canteen cooking and refrigerant gasses for cooling systems in our Vietnam factories. The 2024 emissions have increased compared to the base year 2022 by 3%. This increase is mainly due to the fuel consumption of our vehicle fleet. To address this, we are replacing our fleet with electric cars, with the first batch received in November 2024.

Scope 2

Scope 2 emissions of 2024 were at 7,890 tCO₂e location-based or 7,027 tCO₂e market-based, covering 28% or 26% of overall Sonion emissions, respectively. The main contributor to these emissions is the electricity consumption of our factories in Vietnam. The 2024 emissions have decreased significantly compared to the base year 2022 by 37% location-based due to the closure of Sonion Philippines and due to the grid decarbonization in Vietnam, resulting in a lower emission factor compared to the base year.

Scope 3

Scope 3 emissions of 2024 were at 19,661 tCO₂e, responsible for 69% of overall Sonion emissions. The main contributors to these emissions are Capital Goods (31% of Scope 3), Purchased Goods and Services (21% of Scope 3), Employee Commute (17% of Scope 3) and Downstream Transportation and Distribution (9% of Scope 3). Overall, in 2024, Scope 3 emissions have increased by 13% compared to the base year 2022. This increase is mainly driven by the Capital Goods category, caused by an increase in automation activities, electric vehicle fleet purchases and new capital goods methodology.

GHG emissions	Unit	2024	2023	Base year 2022	Difference %
Scope 1					
Gross Scope 1 GHG emissions	tCO ₂ e	970	759	943	3%
Scope 2					
Gross location-based scope 2 GHG emissions	tCO ₂ e	7890	11,016	12,525	-37%
Gross market-based scope 2 GHG emissions	tCO ₂ e	7027	7800	8567	-18%
Scope 3					
1. Purchased goods and services	tCO ₂ e	4410	3975	5151	-14%
2. Capital goods	tCO ₂ e	6170	2430	2987	107%
3. Fuel and energy-related Activities (not included in Scope 1 or Scope 2)	tCO ₂ e	1847	2557	2792	-34%
4. Upstream transportation and distribution	tCO ₂ e	1163	790	1717	-32%
5. Waste generated in operations	tCO ₂ e	220	401	404	-45%
6. Business travel	tCO ₂ e	771	688	473	63%
7. Employee commuting	tCO ₂ e	3259	2703	2830	15%
9. Downstream transportation	tCO ₂ e	1779	1732	1019	74%
11. Use of sold products	tCO ₂ e	42	55	31	37%
12. End-of-life treatment of sold products	tCO ₂ e	0.1	0.2	0.3	-68%
Total GHG emissions (location-based)	tCO₂e	28,521	27,107	30,873	-8%
Total GHG emissions (market-based)	tCO₂e	27,346	23,890	26,915	2%

Note: Difference in % is 2024 compared to the base year 2022.

Accounting policies - GHG emissions

Disclosure requirement	Accounting policy
Scope 1	GHG emissions refer to the direct emissions from sources that are owned or controlled by the organization. UK Gov. GHG emission factors applied.
Scope 2	Indirect GHG emissions resulting from the purchased energy, used by the organization.
Scope 2 location-based	Emissions are calculated using country-specific emission factors from the International Energy Agency (IEA) for Vietnam and the Philippines. The Association of Issuing Bodies (AIB) is used for the Netherlands.
Scope 2 market-based	Emissions are calculated using specific energy contracts, including DPPA in the Philippines.
Scope 3	Indirect GHG emissions attributed to an organization's value chain.
1. Purchased goods and services	Calculated based on weight of purchased goods (including packaging weight). Goods are being allocated to high-level categories based on estimates. Ecoinvent emission factors are used per category to estimate total emissions. Major increase in accuracy of accounting planned for 2025.
2. Capital goods	Spend-based estimates. 2024 data based on revised methodology, resulting in significant increase in emissions (EXIOBASE). 2022 and 2023 data have not been recalculated from the previously used approach (US EPA) to estimate emissions.
3. Fuel and energy-related Activities (not included in Scope 1 or Scope 2)	Well-to-tank emission factors are applied to fossil fuels identified in Scope 1 and Scope 2 sources above, as well as fuels relating to employee commute, business travel and freight travel under upstream transportation & distribution.

Disclosure requirement	Accounting policy
4. Upstream transportation and distribution	Primary data used for transported goods including weight, distance travelled and type of transport. The received data is converted to CO ₂ by using converting the provided data to tonne.km and using appropriate emission factors from the UK government.
5. Waste generated in operations	The waste figures are converted from kg to CO ₂ e using the appropriate UK Gov. GHG conversion figures applied. A change in calculation of weight for Vietnam as of July 2024: direct waste weight measurement replaced previously used weight estimate per measured cubic meter of non-recycled waste.
6. Business travel	Covers flights and hotels for Vietnam and the Philippines and flights for the Netherlands, Denmark and Poland. UK Gov. emission factors are used.
7. Employee commuting	Calculated based on answers from Sonion HCMC survey (distance, type of transportation, days/week), multiplied by the number of workers during the year and matching emission factors from UK Gov.
9. Downstream transportation	Based on the volumetric weight of goods, distance travelled and the type of transportation. UK Gov. emission factors are used.
11. Use of sold products	Estimates for the number of all products sold, based on estimated energy usage of selected high-runner products, and an estimate of the device lifetime. Estimation of sales split per region and the average electricity per region.
12. End-of-life treatment of sold products	Based on estimated total weight of finished goods sold, UK Gov. emission factors for an assumed split of WEEE recycled and landfill are used.
Total GHG emissions	Scope 1+2+3 using either location or market-based figure for each total.

Pollution

We recognize the risk to human health and the environment from harmful substances and pollutants. Sonion is dedicated to minimizing these risks by complying with all relevant legislation and implementing the necessary practices across its facilities.



Processes to identify and assess impacts, risks and opportunities

ESRS 2 IRO-1

As part of our DMA, we reviewed all site locations and the related activities with a view to identifying potential material impacts, risks and opportunities relating to pollution and substances of concern. The outcome was a potential impact and a risk, both related to the use of chemical substances.

Policies

E2-1

Sonion is committed to complying with all applicable environmental laws and regulations, such as REACH, RoHS and POPs, ensuring a high level of protection for human health and the environment from harmful substances and pollutants. This commitment is stated in our new Environmental Policy adopted in 2024.

E2 - Pollution

Topic	Description		Value chain			Time horizon		
			Upstream	Own operation	Downstream	Short	Medium	Long
Safety risks for wrong use of substances	Prolonged exposure to certain substances could cause harm if PPE were not in place	Potential negative impact		■				■
Substance bans	Bans or restrictions on important substances or materials	Risk		■			■	■

Actions and resources

E2-2

To ensure our products do not contain hazardous or harmful materials, we comply with the EU Directive on the Restriction of the use of certain Hazardous Substances (RoHS) in electrical and electronic equipment, including its amendment, 2015/863, and with the EU's regulation 1907/2006 on the Registration, Evaluation and Authorization of Chemicals (REACH). Our Environmental Law & Regulations Coordinator monitors and approves parts and materials for new products based on supplier information and testing. Lead-free alternatives have been investigated for parts containing lead under RoHS exemptions. These will be implemented when appropriate from a customer perspective, and the renewal status of exemptions will be taken into account. REACH SVHC updates are closely tracked for consequences for Sonion products. Through this, it was identified that one of the additions in January 2024 is present in a customer-defined material above 0.1%. No materials were affected by additions in June 2024.

By ensuring compliance data is in place, for instance, through Material Safety Datasheets, Sonion monitors the use of hazardous substances. Knowledge of hazardous substances is continuously evolving, and therefore, Sonion closely monitors anticipated changes to new legislation. This allows us to proactively identify the use of potentially hazardous substances and take appropriate actions before substance bans come into place. For instance, Sonion has engaged both suppliers and customers on PFAS to ensure that we continue to produce safe products that will meet relevant upcoming PFAS bans. In addition to monitoring the changes in legislation, Sonion requires suppliers to provide updated compliance information whenever the compliance information available becomes out of date.

Substances of concern and substances of very high concern

E2-5

The use of any hazardous substances, as defined under the relevant legislation, such as REACH and RoHS, is tracked. In 2024, there were various substances of (very high) concern known to be used at Sonion, but with sufficient control on processes, meaning these substances are well below reporting thresholds and not a risk for safety.

The substance 2-(2H-benzotriazol-2-yl)-4-(1,1,3,3-tetramethylbutyl)phenol is a customer-defined material known to be present at a concentration of 0.144% in certain materials. Lead is used in copper alloys up to 4% in various products. Lastly, Tetrabromobisphenol A (TBBPA) is known to be present in a limited set of products in concentrations up to 0.192%.



Water and marine resources

Recognizing the significance of responsible water management, Sonion is dedicated to minimizing consumption and implementing sustainable practices across its facilities. Our disclosure on water and marine resources are on voluntary basis as need identified as material.



Processes to identify and assess impacts, risks and opportunities

ESRS 2 IRO-1

We have focused on managing the water we withdraw for our operations for some years, and in connection with the DMA, we evaluated internal processes and uses of water and assessed the state of water risk at our sites in Vietnam, where we rely the most on water. We have not found our water use to be of material significance but have voluntarily disclosed our water withdrawals for other business purposes. Also, we did not identify any site locations with a high water risk when assessing them through dedicated tools.

E3 - Water and marine resources - Voluntary disclosure, not material

Topic	Description		Value chain			Time horizon		
			Upstream	Own operation	Downstream	Short	Medium	Long
Water used in own operations	Water used in our own operations relating to manufacturing and for general well-being and cleaning	Potential negative impact		■		■	■	■
Water used in the value chain	Water used in our upstream value chain for materials extraction and processing impacting nature	Potential negative impact	■			■	■	■

Policies

E3-1

Sonion is committed to protecting the environment and integrating environmental considerations into all our business practices. Our commitment includes monitoring and continuously improving water consumption at all production sites to ensure efficient utilization of resources, as reflected in our new Environmental Policy from 2024.

Actions and resources

E3-2

Our improvement actions in 2024 included various water conservation measures. We initiated the re-use of RO (Reverse Osmosis) water to supply restrooms for cleaning purposes and the collection and use of rainwater and condensate water from air handling units for gardening and plant irrigation purposes. For 2024, the total water saving from the improvement actions was 1,163 m³. Previous improvement actions, including fixing leaks, awareness campaigns, signage installation, self-closing valves, and regular maintenance, are still ongoing. The cease of operations at the Philippine site is also reflected in the lesser use of water. Weekly monitoring, pattern analysis, and spike investigation have further optimized water usage.

To minimize the environmental impact related to wastewater discharge and to ensure compliance with the wastewater quality standards, our facilities in Vietnam have their own wastewater treatment facility to ensure water is treated prior to discharge.

Water withdrawal

E3-4

In 2024, the total water withdrawal was 91,745 m³, which is 17.4% lower compared to 2023. A continuous decrease in water with-

drawal from 2023 to 2024 reflects Sonion's commitment to minimizing environmental impacts pertaining to water resources.

Datapoint	Unit	2024	2023
Total water withdrawal	1,000 m ³	91.7	111.1



Accounting policy

Water withdrawal

Water used at production sites, based on meter readings and invoices.

Resource use and circular economy

Sonion acknowledges the importance of reducing waste and maximizing resource efficiency, and we have increased our focus on waste management. Each Sonion manufacturing facility is responsible for waste separation, collection, disposal, and treatment.



Processes to identify and assess impacts, risks and opportunities

ESRS 2 IRO-1

In connection with our DMA, we reviewed and assessed purchased materials for production, packaging materials and other resources required to run our operations. We also reviewed our waste streams which we have also reported on historically, and overall concluded on three potential impacts.

Policies

E5-1

Sonion is committed to protecting the environment and integrating environmental considerations into all our business practices. Included in the new Environmental Policy from 2024 is our commitment to increase waste recovery in all production areas and support services, as well as embedding a sustainability mindset throughout our activities and product design, development, manufacture, distribution, and end-of-life management.

E5 - Resource use and circular economy

Topic	Description		Value chain			Time horizon		
			Upstream	Own operation	Downstream	Short	Medium	Long
Optimizing products and packaging	Improve and minimize the footprint of products and packaging	Potential negative impact		■		■	■	■
Materials procured responsibly	Sourcing supplies in a responsible way, minimizing footprint	Potential negative impact	■			■	■	■
Waste from operations	Managing waste responsibly, recycling and minimizing amounts	Potential negative impact		■	■	■	■	■

Actions and resources

E5-2

In 2024, the total amount of waste generated across all manufacturing operations is 784,5t, reduced by 18.08% compared to 2023. Total recycled waste for 2024 is 36.53%, while non-recycled waste generated at Sonion manufacturing sites was 48.03%. The decrease in non-recyclable waste compared to 2023 was 45.91%. Hazardous waste, which underwent treatment prior to disposal, was 15.44%.

Significant contributions to the decrease in waste generation come from the cessation of operations in the Philippines, effective at the end of June 2024. The reduction in waste generation is also driven by various waste

management initiatives and the more accurate way of measuring the domestic waste in our Ho Chi Minh City factory in Vietnam, from per cubic meter calculation to actual weighing scale measurement. The increase in hazardous waste from 81.5t to 121.1t was caused by the disposal of obsolete chemicals at the closure of the Philippines facility.

We also enhanced waste management by sorting recyclable and non-recyclable waste into all generation areas. We have been increasing awareness and providing guidance on waste segregation through waste management visual display videos in our facilities.

Datapoint	Unit	2024	2023
Total waste generated		784.5	958.9
Recycled	Tonnes	286.5	181.1
Non-recycled	Tonnes	376.8	777.8
– of this Hazardous	Tonnes	121.1	81.5

Accounting policy

Total waste generated

Data is collected from the production sites based on measurement data, weight recipes and estimations.

Social

Own workforce	41
Workers in the value chain	55
Affected Communities	57
Consumers and End-users	58

Our Sonion Culture

Our behavior:

We stand for a culture of being respectful, embracing hunger for growth and drive for continuous development.

Our approach:

We foster the Sonion mindset, which is demonstrating pro-active attitude, concise communication, while setting high standards and being demanding to ourselves and colleagues.

Our execution:

We conduct our business in an inclusive, professional and ethical manner in line with our Sonion values, delivering exceptional solutions to our customers.

Own workforce

We strive to foster a respectful working culture that embraces openness and inclusivity in our communication, internal collaborations, and overall approach to people and daily tasks. Our commitment is to ensure our employees thrive by offering a safe and inspiring work environment. We believe that the best solutions arise from collaborating with colleagues, customers, and external partners.

Our employees are essential to our growth. Developing our team and ensuring a consistent understanding of Sonion's culture, procedures, and compliance framework are key to our strategy. Managing our social impacts is crucial to creating a safe, appealing, and meaningful workplace. This section addresses the sustainability topics identified in our materiality assessment.

S1 - Own workforce

Topic	Description		Value chain			Time horizon		
			Upstream	Own operation	Downstream	Short	Medium	Long
Attractive working conditions	Established structures and opportunities for dialogue on conditions and rights, access to various types of leave and benefits	Actual positive impact		■		■	■	■
H&S in operations and offices	Ensuring a safe and healthy working environment	Potential negative impact		■		■	■	■
Diverse, fair and secure place to be employed	Ensuring equal opportunity, lifelong training and learning in a diverse and inclusive work environment	Actual positive impact		■		■	■	■
Overtime management	Ensuring responsible working time arrangements for good health and the right product quality	Potential negative impact		■		■	■	■
Safeguarding employee data privacy	Implementing and following regulations and good practices to safeguard employee data privacy	Potential negative impact		■		■	■	■
Health epidemics	Disruption of operations by sudden epidemics or outbreaks	Risk		■		■	■	■

Interests and views of stakeholders

ESRS 2 SBM-2

We regularly conduct engagement surveys to gather employee feedback, understand engagement levels, and identify improvement areas. Our ongoing health and safety management and workplace assessments ensure a safe, compliant environment. We include employee perspectives in decision-making to foster inclusivity and collaboration, including ongoing dialogue with the local employee representatives. We strive to maintain an attractive workplace that promotes well-being, offering a comfortable environment, competitive benefits, and growth opportunities. Our policies are reviewed regularly to stay effective, and we are committed to continuous improvement and prompt issue resolution.

Material impacts, risks and opportunities and their interaction with strategy and business model

ESRS 2 SBM-3

As part of our DMA conducted in 2024 several Impacts, Risks and Opportunities were identified relating to our own work-force. The identified IROs apply across our geographies, and are generally more concentrated in our operation sites in

Vietnam. They do not specifically apply to specific functions or job roles, or other such factors. We do not consider that there is any risk of forced labor or child labor connected to our operations.



Policies

S1-1

Working Conditions and Human Rights

We are committed to meeting our responsibility to respect human rights as defined by the UN Guiding Principles on Business and Human Rights. That means we recognize our responsibility to respect all internationally recognized human rights across our activities and business relationships. Sonion has been a signatory to the UN Global Compact and its Ten Principles since May 2023.

Our Human Rights Policy formalizes and specifies Sonion's commitment to supporting and respecting human rights for all people as stated in the Sonion Code of Conduct. This includes acting in compliance with laws on freedom of association and laws prohibiting forced, compulsory, and child labor, human trafficking, and discrimination. This includes our active support and adherence to the International Labor Organization's Declaration of Fundamental Principles and Rights at Work.

We recognize that our main manufacturing sites in Vietnam and many of our suppliers' locations in high-risk countries enhance the risk of human rights and labor violations.

We address these risks by establishing strong local management teams and strictly enforcing the ILO principles to ensure compliance.

Our People & Labor Policy, which expands on our human rights commitments, was developed in 2024 and formalizes and specifies our commitment to respecting human rights in everything we do. This commitment means actively ensuring fair labor and employment standards for all our employees.

The policy covers our commitments, our culture and our values and includes the following specific topics:

- Working hours, adequate, fair and equal pay, and leave and entitlements to support work-life balance
- Prohibition of child labor and protection of young workers, and modern slavery
- Safe and inclusive working environment, training and employee privacy

- Freedom of association, engagement with employees or representatives
- Grievances and complaints

Sonion has also committed to set up specific targets on the following focus areas to support and drive our commitment:

- Employee Engagement: conducting regular surveys (EES) and setting targets
- Gender & diversity: setting targets for diversity in the management and leadership teams
- Training: conducting regular training and monitoring attendance
- Employee turnover: monitoring employee turnover
- Compliance: Ensuring compliance with all applicable local laws and regulations in all locations and countries in which Sonion operates.

Employee data privacy

Sonion wants to ensure a high and adequate level of data protection, as privacy is a keystone in gaining and maintaining the trust of our employees and protecting their privacy. We have adopted a number of

internal and external data protection policies, which Sonion employees must adhere to. Our General Privacy Policy and actions are disclosed in section G-1.

Employee data privacy – General Data Privacy policy, local policies and action see disclosures in section G under Cyber Risk and Data Protection.

See also the overview of our policies to supplement the disclosures in this section, on page 26.

Diversity, Equity, and Inclusion

Sonion is a global organization. We are present in many parts of the world and recognize the value of a diverse workforce that brings varied experiences, ideas, and innovation to the workplace. We employ people with different ethnic backgrounds, nationalities, ages, genders, and levels of education. We encourage respect for diversity and strive to treat all employees fairly.

Our Diversity, Equity, and Inclusion Policy supports our commitment to ensuring that diversity, equity, and inclusion are embedded across our organization and that we do not discriminate on the basis of race, color, sex, disabilities, religion, political opinion, national extraction, sexual orientation, gender identity, or social origin. To

support and promote our diversity, equity and inclusion ambitions and raise awareness at all relevant levels of the organization, we have defined global and local initiatives:

- For all open positions, as far as possible, include candidates of the underrepresented gender, and for all managerial positions, the inclusion of at least one candidate of the underrepresented gender in the recruitment process.
- Local initiatives at our sites in Vietnam to support women with work-life balance.
- Identify local community initiatives that support women in engineering.
- Training and active focus on inclusive leadership, including transparent communication and a strong feedback culture.
- Creating awareness of our 'Speak Up' culture to ensure and encourage open and honest communication on DE&I issues

We want to ensure a relevant gender and diversity balance in our overall employee population and management teams. Therefore, we actively use our recruitment process to ensure a strong focus on diversity, including initiatives to support the development of our female employees and

encourage them to take on managerial roles.

Employee Engagement, Development and Retention

We are committed to cultivating a workplace where our employees are motivated and genuinely care about the company's success and a high level of engagement is key to maintaining a sustainable business and our ongoing success and development.

Employee Engagement

At Sonion, we have committed to regularly conducting an Employee Engagement Survey (EES). The EES is a key component in ensuring the well-being of our employees and identifying areas for improvement.

Leadership and Talent Development

Sonion remains committed to fostering a culture of continuous learning and development, recognizing the crucial role employees play in the sustainable growth of the company. To support this ambition, we have several development courses designed to attract, develop, and maintain talent and drive for a diverse and inclusive global organization.

The Sonion Academy Program consists of several courses designed to build high-per-

forming teamwork and develop our leadership teams.

Promotion of Internships

Sonion wishes to attract the right talent, and we work closely with various universities worldwide. We offer students the opportunity to work in our organization as members of our research and development teams, either as interns or as part of their bachelor's, master's, or PhD thesis work. The commitment is not stated in our policies but is part of our effort to ensure that we identify the talent that can support our strategy and growth.

Employee Turnover

We aim to create a strong and stable workplace culture where employees enjoy working and can develop their careers. To ensure employee turnover is at a healthy level, we are constantly working on further improvements to increase employee retention. We monitor employee turnover at our sites and conduct exit interviews to understand the rationale for leaving and identify potential measures to be put in place.

Health and Safety

At Sonion, our employees' health, safety, and well-being are a high priority. We are committed to continuous improvement and creating a safe and supportive work

environment that supports and protects our employees. Our commitments are reflected in our Health and Safety Policy.

Health and safety management is anchored locally at our sites. In our operations, rigorous occupational health and safety processes are in place, including training, incident reporting, and tracking of key metrics. Our manufacturing sites are ISO45001 certified.

We provide our employees with various benefit plans, including health insurance. We have also established on-site health clinics at our factories in Vietnam to provide high-quality medical care for our employees, a proactive measure to support our employees' health.

At our manufacturing facilities and offices worldwide, we have implemented various health and safety procedures, including Hazard Identification, Risk Assessment, and Control (HIRAC). All employees undergo annual health check-ups and receive safety, health, and environmental (SHE) training.

Lost Time Incidents

We are committed to maintaining a safe workplace for all our employees. We regularly track and measure lost-time incidents to identify their underlying causes and take

preventative action. Our operations have relatively low exposure to health and safety risks. The manufacturing processes are generally not the cause of injuries and lost workdays.

Mental Health and Well-being

Our workplace policies and procedures are regularly reviewed and improved to ensure a positive and supportive work environment to reduce the risk of stress and burnout. Supporting our employees' emotional and mental well-being in the workplace is a key part of our health programs and includes promoting initiatives that support employee health, such as wellness programs, mental health resources, and ergonomics assessments. Employees can access resources and support for their mental and emotional well-being through employee assistance programs and mental health support.

Health Epidemics

A few years back, the Covid-19 pandemic showed how unforeseen events can have major impacts on both everyday life and businesses. At Sonion, we remain proud of the collective efforts of our colleagues when we succeeded in minimizing the effects, proving that in challenging times, we could both operate in ways where we managed to protect our colleagues and, to a large extent,

continue operations and deliveries that our customers and their end-users relied on.

Our overall risk and resiliency management procedures are strong mitigating factors to prevent financial loss should a comparable situation occur where a minimized availability of our colleagues makes continuing operations a challenge.



Processes for engaging with own workers and workers' representatives

S1-2

Engagement Surveys

We regularly conduct an Employee Engagement Survey (EES). The EES is a key component of our efforts to ensure the well-being of our employees and identify areas for improvement. The EES survey is conducted every 18 months, and once completed, the managers discuss the results with their teams, and actions are implemented to ensure that issues are addressed. The survey covers themes such as engagement, motivation, management, working conditions, remuneration, training and development, and working environment. The survey is conducted by an external company and benchmarked to similar companies.

In addition to the survey, each employee receives annual performance appraisals to ensure continuous engagement and development.

Engagement with trade unions and works councils

We engage with local employee representatives and labor unions, and open and ongoing communication contributes to and develops the relationship with our employees.

In Vietnam, labor union representatives, in collaboration with the local management team, organize annual meetings, consisting of one major meeting and three smaller sessions throughout the year, to ensure continuous dialogue and address workplace concerns. In the Netherlands, the Works Council, consisting of employee-elected members, meets with the local managing directors monthly to discuss ongoing issues and future plans. These meetings ensure continuous dialogue between employees and management. The Works Council must be consulted on major company decisions that affect the workforce, such as changes to working conditions, employment terms, and company policies.

Processes to remediate negative impacts and channels to raise concerns

S1-3

Speak Up

The Sonion Speak Up policy encourages employees to contact their immediate manager or another manager to discuss a work-related issue or concern. If the employee does not think a concern will not be properly addressed within the hierarchy, the employee can approach the local HR department or the Compliance Officer. Our local sites also offer various other grievances and complaint-handling options.

If the employee is not comfortable with this, or if the employee has already taken action as described above and believes that the issue has not been handled correctly, they can report the issue to the Sonion Whistleblower Line in accordance with the Sonion Whistleblower Policy.

All employees can make a complaint or raise a grievance without fear of retaliation.

Our Code of Conduct explicitly addresses how every employee is expected to be aware of and report any concerns about non-compliant conduct or actual or suspected lack of respect for human and labour rights in

Sonion, among our partners, or in the supply chain. This is communicated via the intranet, information boards and training on our Code of Conduct.

The Sonion Whistleblower Line

In addition to our Speak Up policy and local grievance complaints systems, we also have the Sonion Whistleblower Line. All Sonion employees globally and former employees can use the Whistleblower Line. The Sonion Whistleblower Line is for the reporting of serious offences that may affect the Sonion Group, or that may be crucial for an individual's life or health or suspicion of such matters. Our Whistleblower Line is described in section G1-1.

Actions and resources

S1-4

The following key actions have been taken during the year to continue efficient operations of our initiatives or to enhance our efforts further.

Working Conditions and Human Rights

Following the adoption of our Human Rights Policy in 2023, we have prepared our new People and Labor Policy in 2024. We consider the current measures to constitute a robust practice respecting our people and their rights.

Human rights are embedded in our Code of Conduct, and in 2024, all employees were asked to complete a course on our Code of Conduct, which included several human rights issues. All management, sales and procurement teams were in 2023 required to complete online awareness training on Forced Labor & Human Trafficking and in 2025, this training will be followed up by a course dedicated to Human Trafficking. Other actions concerning human rights are also included in the topical sections for

employees and in the S2 section for workers in the value chain.

Diversity, Equity, and Inclusion

The Global Management Team (GMT) comprises the Senior Management, including the Executive Management, and our local site Management Teams and 24% of them are women. Female representation on the Sonion Board of Directors increased from 14% to 25% in January 2024, meeting the target set for 2023 to enhance female presence on the Board.

Blue-collar workers/direct laborers constitute 86% of our workforce, and 95% are women. The engineers in our Research & Development departments are primarily men, while most women are employed in our production. At the general people manager level, there is a majority of male managers, but we see a continuing increase in female managers, especially at our sites in Vietnam. We wish to ensure a relevant gender and diversity balance in our overall employee population and management teams. Therefore, we will actively use our recruitment process to ensure a strong focus on diversity, including initiatives to support

the development of our female employees and encourage them to take on managerial roles. In our Diversity, Equity, and Inclusion Policy implemented in 2023, we expressly committed to, as far as possible, including candidates of the underrepresented gender for all open positions and all managerial positions, requiring that there is at least one candidate of the underrepresented gender included in the recruitment process. In 2025 we will continue these recruitment practices at all our sites.

In the Netherlands, 17% of technical professionals are women. To help change this, Sonion Netherlands joined a local initiative to inspire young girls. In 2024, we hosted 20 girls aged 12-14 for a tour, demo, and workshop, showcasing the exciting world of technology. This effort is part of the national Girls Day initiative, aimed at increasing the number of women in technical fields.

We want to continue growing our understanding of inclusion and equity concepts. At our site in the Netherlands, we have had a DE&I Team since 2022, with participants from our HR team and volunteering employees. The DE&I Team has conducted interviews,



held workshops, and conducted a general survey. Based on the results, a road map for how DE&I can be integrated into Sonion Netherlands has been defined. In Vietnam, local events and information have promoted the understanding of diversity and inclusion, focusing on respecting each other.

Employee Engagement, Development and Retention

Employee Engagement

Sonion regularly conducts an Employee Engagement Survey (EES) to assess and enhance workplace satisfaction. In 2024, we achieved a 95% response rate, with the overall score increasing to 83 from 82 in 2022, successfully surpassing our goal of maintaining an 80+ score in employee satisfaction and motivation. The score was adjusted to exclude Sonion Philippines for accurate comparison, as they did not participate in the 2024 survey. Sonion outperformed the Ennova Top-in-Class 5% benchmark for 'Large International Companies,' underscoring our global leadership in employee well-being and engagement. The next survey will be held by the end of 2025.

Leadership and Talent Development Program

In 2024, Sonion continued its focus on employee and leadership development through the Sonion Academy Program.

All Sonion local management teams worldwide have been part of a 9-day Leadership Training Program over three sessions held in the Netherlands and Vietnam, concluding in Q4 2024. This initiative aimed to strengthen organizational leadership and management capabilities, covering inclusive leadership, coaching skills, feedback, situational leadership, leading others, and self-reflection.

The High Potential Leadership Program was introduced in the Netherlands, where 9 talented employees completed a year-long leadership training. The Leadership program is specifically designed for employees who are ready for the next step in their development. The program's objectives have been for participants to take demonstrable steps in their personal performance and leadership by developing skills and strengthening their personal leadership.

The leadership programs for Line Managers and Shift Leaders continued at our production sites in Vietnam.

Promotion of Internships

In Sonion Netherlands, we continuously have a flow of new interns joining twice a year. In 2024, six interns from various universities across the country worked on important projects, added a fresh perspective to

the teams and showed a lot of enthusiasm for our products.

In Sonion Vietnam, we welcomed eight interns to our Production, R&D and Finance departments through a recruitment program in collaboration with local universities in Ho Chi Minh City. This initiative provided them with hands-on experience in production operations and opportunities for skills development. Our goal is to foster their professional growth and potentially welcome many of them back as employees upon graduation.

These programs aim to bridge the gap between academic learning and practical application and strengthen our partnership with local educational institutions.

Health & Safety

At Sonion, employee health and safety are central to our sustainability efforts. In 2024, we introduced a new Health and Safety Policy to ensure a safe working environment across all our sites. We are proud to report zero fatalities or serious injuries in 2024, highlighting our dedication to maintaining a safe and healthy workplace for all employees.

Sonion ensures 100% coverage of employees and contractors under the Health Manage-

ment System across all operational sites. In Vietnam, all employees are offered an annual health check. In 2024, two work-related accidents were recorded compared to one (1) in 2023. Our results for the year highlight Sonion's ongoing efforts to maintain a safe and healthy working environment with continuous improvement initiatives in place to enhance safety across all operations.

Mental Health and Well-being

To support our employees' emotional and mental well-being, we have implemented several practices that help them develop effective coping mechanisms for managing stress. In 2024, we continued to promote access to mental health support with OpenUp for our employees based in the Netherlands. OpenUp offers fast and easy access to psychologists via phone, chat, or video consultations, providing practical tips and insights. In 2025, this support will be extended to our other sites in Europe.

At our production sites in Vietnam, we continue to monitor noise levels in the workplace to protect our employees' health and promote a healthier work environment that boosts productivity and focus.

Employee activities

In 2024, Sonion organized and supported various activities and events to promote employee well-being and engagement across all our sites. In Vietnam, we hosted the annual New Year Party in January, which brought employees together to celebrate and strengthen connections. Sports activities included a Football Tournament featuring a friendly match between the Ho Chi Minh and Vung Tau sites and a Badminton Tournament. Additionally, several team-building activities were held to encourage collaboration and teamwork. We also marked our 50 year anniversary with events and parties at all our sites.



Targets

S1-5

We have high ambitions for how we manage our business and treat our people. Across the different important topics, we maintain clear plans and have defined our ambitions. For two topics, we have set targets that are presented to and approved by the Board of Directors, which are also material to report on.

Diversity, Equity, and Inclusion

To drive and ensure our commitment to a diverse composition of our Board of Directors and Global Management Team (GMT), we have set the targets to have 35% women on the Board of Directors and 35% women in the GMT by 2027. The current progress towards these targets is progressing for the Board of Directors, with 29% women in 2024, and for GMT, the representation has not changed and is still at 24%.

Employee Engagement

We have set a target for the 2024 EES aiming to maintain an overall score of 80+ in employee satisfaction and motivation. This was achieved, and our target going forward will be to maintain a score of minimum 80, planned for evaluation in our next EES in 2025.

Characteristics of employees

S1-6

Sonion Workforce

The majority of our workforce is based in Vietnam, where our manufacturing sites are located in Ho Chi Minh City and Vung Tau, while our R&D facility operates out of the Netherlands. Our workforce has a strong female presence, accounting for 87.5% of the total workforce. This high percentage of female gender composition is primarily due to the fact that most of the positions at the manufacturing lines are held by women, while men are more concentrated in the technical and engineering roles. Sonion currently employs 5,560 permanent employees (FTE), with only 10 temporary employees, mainly in short-term supporting roles.

Number of employees by gender	2024	2023
Men	712	783
Women	4,858	5,138
Total	5,570	5,921

Employees per country	2024	2023
Denmark	12	11
Netherlands	99	96
Vietnam	5,440	5,178
Others*	19	636
Total	5,570	5,921

*Including the Philippines site, which was closed in 2024.

Employment characteristics	2024			
	Women	Men	Other/not reported	Total
Employees				
Permanent employment	4,852	708	0	5,560
Temporary employment	6	4	0	10
Non-guaranteed hourly employment	0	0	0	0

Accounting policy

Number of employees by gender

The number of employees is calculated by aggregating the male and female employee headcount across all countries of operation as an average at Year End.

Employees per country

The number of employees per country is calculated by aggregating the employee headcount across all countries of operation at Year End.

Employment characteristics

The number of employees per country is calculated by aggregating the employee headcount across all countries of operation at Year End.

Calculated by aggregating all full time and part time employees whose employment agreement does not have a fixed end date.

Temporary employment

Calculated by aggregating employees whose whose weekly hours are fixed (full time or part time), but where the agreement has a fixed end date.

Non-guaranteed employment

Calculated by aggregating employees whose employment agreement does not specify specific weekly working hours.

All three categories are calculated by aggregating headcounts at Year End.

Employee Turnover

The global turnover rate was 29% in 2024, calculated based on voluntary resignations over employees' average headcount. Given the significant number of blue-collar employees in our Vietnam locations, the global turnover rate is biased toward their movements. This shows an increase compared to 2023, but still a position that is considered acceptable. The turnover is mainly focused on (i) blue-collar employees of short tenure who are unable to adapt to

the high precision production processes, (ii) blue-collar employees who are willing to move to other employers with less stringent governance of overtime, and (iii) blue-collar employees who, as is common in Vietnam, are willing to move to new locations to support family commitments. Sonion has a high focus on the well-being of our workforce and closely monitors the reasons for leaving to ensure continuous improvement is undertaken wherever reasonable.

Employee turnover	2024	2023
Rate	29%	26%

Employee Retention and Engagement metrics (Entity Specific metrics)

See section S1-4 for more details.

Employee Engagement Survey	2024	2022
Number of participating employees	4,851	6,313
Response Rate (%)	95	87
Satisfaction (%)	83	82

	2024	2023
Sonion score	83	82
Ennova benchmark top 10%	79	80
Ennova benchmark top 5%	80	81

Accounting policy

Employee turnover

The number of employees is calculated by aggregating employees who have left the company during the reporting period.

The rate is calculated by dividing the number of employees who left by the total number of employees by total headcounts at year-end.

Employee Engagement Survey

The score is calculated from four questions on Satisfaction & Motivation as a weighted average and based on all Sonion employees having answered the four questions. The survey is administered by an external vendor

Ennova's GELx benchmarks are published annually based on over 25 million data points. They include national and industry-specific benchmarks. The Top in Class benchmarks are segmented into categories like the top 25%, 10%, and 5%. For example, a score of 80 in Satisfaction & Motivation places a company in the top 25%. Sonion is compared with similar international companies with 2000+ employees outside the Nordic region.

Collective bargaining coverage and social dialogue

S1-8

In the Netherlands, 99% of employees are covered by collective bargaining agreements, while in Vietnam, 96% are similarly covered.

	Collective bargaining	Collective bargaining	Social dialog
Percentage covered	Employees in EEA	Employees outside EEA	Workplace representation (EEA only)
0-19%			
20-39%			
40-59%			
60-79%			
80-100%	The Netherlands	Vietnam	The Netherlands

Diversity metrics

S1-9

Diversity, Equity and Inclusion

See section S1-4 for more details.

Global age distribution	2024
<30	2,955
>30; <50	2,543
>50	72
Total	5,570

Gender distribution Global Management Team	2024	2023
Men	29 / 76%	29 / 76%
Women	9 / 24%	9 / 24%

Gender distribution Board of Directors	2024	2023
Men	5 / 71%	6 / 75%
Women	2 / 29%	2 / 25%
Total	7 / 100%	8 / 100%

Accounting policy

Collective bargaining

Calculated by aggregating the total headcount of employees covered by a collective bargaining agreement and dividing this with the full headcount number, both numbers in year-end totals.

Social dialog

Calculated by aggregating the total headcount of EEA employees per country covered by workers' representatives and dividing this by the full headcount number, both numbers in year-end totals.

Diversity, Equity and Inclusion

Calculated by aggregating employees by headcount at year end, by their age group.

Gender distribution, GMT

Global Management Team (GMT) is defined as the Senior Management, including the Executive Management and the local site Management Teams. Diversity is reported as the percentage split by gender in the GMT.

Gender distribution, Board of Directors

The Board of Directors are defined as members elected by the general meeting. Diversity on the Board of Directors is reported as the percentage split by gender among all members.

Adequate wages

S1-10

At Sonion, we are committed to giving our employees adequate, fair and equal pay as stated in our People and Labor Policy.

The compensation paid to employees complies with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits and is in line with collective bargaining agreements. All employees shall receive equal pay for equal work and qualifications.

Social protection

S1-11

We ensure that our employees are covered against loss of income due to major life-changing events, such as sickness, occupational injury, parental leave, and retirement, in accordance with local laws, employment terms and collective bargaining agreements.

Training and skills development metrics

S1-13

Employee Development

Sonion continues to foster a culture of continuous learning and development, recognizing employees' crucial role in the company's sustainable growth. The annual performance and development reviews and different training courses support our efforts to develop and maintain talent and drive a diverse and inclusive global organization.

Employees collectively logged 3,308 hours of training, with women contributing the majority due to comprising 87.5% of the workforce. Participation in performance and career development reviews was 100%, with 88% of participants being women and 12% men, reflecting full inclusivity across genders in the review process.

Participation in performance and career development reviews	Unit	2024
Women	%	88%
Men	%	12%
Total	%	100%

Training hours, averages	Unit	2024
Women	Hours	2,935
Men	Hours	373
Total	Hours	3,308

Accounting policy

Performance and career development reviews

The annual performance and career development reviews are registered for each employee in the local HR management systems and divided by the number of all employees.

Training

Calculated by aggregating the hours of training that can be documented during the year including on-site and online courses, workshops and formal education.

Health and safety

S1-14

In 2024, two work-related accidents were recorded, compared to one (1) in 2023. There were no recorded cases of work-related ill health or fatalities in either 2024 or 2023. Additionally, the days lost to work-related injuries and fatalities in 2024 were minimal at 0.0065, a significant reduction compared to 2 days in 2023.

See section S1-4 for more details.

Metrics	Unit	2024	2023
Employees covered by HMS	%	100	100
Non-employees/contractors covered by HMS	%	100	100
Work-related accidents	Number	2	1
Cases of recordable work-related ill health	Number	NA	NA
Fatalities as a result of work-related injuries/ill health	Number	0	0
Days lost to work-related injuries and fatalities	Number	0.0065	2

Accounting policy

Employees covered by HMS
 The percentage of employees in our own workforce and non-employees/contractors who are covered by our health and safety management system is defined as the number of employees covered by health and safety management systems divided by all employees.

Number of work-related accidents
 The consolidated number of accidents that occurred for employees within the reporting period was recorded in the local HR and health and safety management systems.

Number of cases of recordable work-related ill health
 Not currently measured.

Number of fatalities
 The number of fatalities registered across all sites resulting from work-related injuries or work-related ill health.

Number of days lost
 The number of days lost, from and including the first full day and last day of absence, and including all calendar days of the period (e.g. incl. weekends and public holidays).

Work-life balance

S1-15

In Sonion, we prioritize work-life balance through policies designed to address the diverse needs of our employees. In 2024, 99% of our workforce is entitled to family-related leave, which includes statutory maternity, paternity and parental leave.

Beyond the mandated leave, we also offer additional family-related leave, such as 'compassionate leave', which gives employees the time to grieve and manage immediate family losses.

Metrics	Unit	2024
Employees entitled to Family-related leave	%	99%
Entitled employees who took leave		
Men	%	1%
Women	%	16%

Compensation metrics (pay gap and total compensation)

S1-16

At Sonion, we are committed to giving our employees fair and equal pay, as stated in our People and Labor Policy. During 2025 and 2026, we will be looking into providing information on the gender pay gap within our organisation. However, for the 2024 reporting period, the specific data required is not available.

Incidents, complaints and severe human rights impacts

S1-17

We address all discrimination incidents and complaints filed directly under our Speak Up and through our Whistleblower Line; see Section S1-3 and G1-1 for more details. We are dedicated to complying with all relevant regulations and to the integrity of our business practices.

No fines or penalties related to discrimination or human rights incidents relating to our workforce were registered in 2024.

Incidents, complaints and fines relating to human rights	Unit	2024
Incidents of discrimination, including harassment	Number	0
Complaints filed	Number	0
National Contact Point reports	Number	0
Fines, penalties and compensation (incidents/complaints)	USD	0
Severe human rights incidents	Number	0
Fines, penalties and compensation (severe incidents)	USD	0

Accounting policy

Family leave

Calculated by aggregating the total number of headcount of employees that took family leave as recorded in the local HR system (for each gender) and dividing this by the total number of employees that were entitled to leave.

Incidents, complaints and fines

Calculated as cases that have been reported to the Head of Compliance or filed with the Whistleblower line and have been substantiated or partially substantiated based on an investigation during the year.

Workers in the value chain

In Sonion, we must have a reliable and responsibly operated supply chain to sustain and continue our successful business. We conduct business with suppliers and business partners who align with our values and share our vision of operating ethically and respecting human rights. We recognize that the workers in our value chain are essential stakeholders whose well-being and rights must always be respected. This section addresses the sustainability topics identified in our materiality assessment.

S2 Workers in the value chain

Topic	Description		Value chain			Time horizon		
			Upstream	Own operation	Downstream	Short	Medium	Long
H&S in value chain (incl. Conflict Minerals)	Value chain workers exposed to unsafe working conditions impacting their health	Potential negative impact	■		■	■	■	■

Interests and views of stakeholders

ESR5 2 SBM-2

While we do not consider that workers in the value chain are in any way likely to be affected by Sonion's operations, we respect the applicable human rights of individuals and are aware that within our upstream value chain especially, there is a risk of violations of human rights of workers.

Material impacts, risks and opportunities and their interaction with strategy and business model

ESR5 2 SBM-3

As part of our DMA conducted in 2024, we identified one Impact and no Risks or Opportunities relating to workers in the value chain. The identified potential impact is predominantly concentrated to specific upstream activities, namely materials extraction of certain metals that are contained in small amounts in the Sonion products.

Additionally, we consider that other sectors in our value chain also have an obligation to maintain safe and healthy operations for their workers, which relate to the additional upstream steps, including the waste management of end-of-life electronics.

Policies

S2-1

The commitments in our Code of Conduct and Supply Chain Policy cover the workers in our value chain. For more information, see section G1-2 on our Responsible Supply Chain commitments, especially our management of suppliers' processing components containing the minerals tin, tantalum, tungsten, and gold.

We recognize that many of our suppliers are located in high-risk countries, which enhances the risk of human rights and labor violations. Our commitment to respecting human rights, including the rights of value chain workers, is stated in our Human Rights Policy see section S1-1. The commitment is also part of our Supplier Sustainability Compliance (Supplier Code of Conduct), which we require all suppliers to acknowledge.

In addition, our Supply Chain Policy and Health & Safety Policy cover our upstream supply chain, with a special focus on the safeguards developed in the Responsible Minerals Initiative and as described in our Conflicts Minerals Policy. See Section G1-2 for more details.

Processes for engaging with value chain workers about impacts

S2-2

Sonion does not engage directly with workers in the value chain, as the identified impacts do not relate directly to Sonion's operations, but are, on the other hand, common potential impacts of the few of the value chain sectors we rely on.



Processes to remediate negative impacts and channels to raise concerns

S2-3

We consider an event where Sonion is directly connected with, or even linked to, a human rights offence in the value chain to be of very low likelihood and have, for the same reason, not established specific processes to remediate impacts.

In the unlikely event that Sonion is, however, directly linked or even contributes to a human rights offence, this would be addressed with significant focus and reported to both the Management Team and the Board of Directors immediately and on an ongoing basis. Sonion would adhere to best practices in handling such cases and support the remediation of affected individuals.

Our Whistleblower Line is available to workers in the value chain and can be found on our website; see G1-1 for more information on the Sonion Whistleblower Line.

Actions and resources

S2-4

During 2024, we have continued existing practices of ensuring supply chain compliance with the Responsible Minerals Initiative; see the G1-2 section for details.

Our DMA was also an important step, as we analyzed a broad range of potential impacts, risks, and opportunities during this process, which in turn confirmed our current strong focus.

Going forward, our commitment will be maintained, and human rights and health and safety will continue to be part of our supplier risk evaluations and ongoing audits. Additionally, we will seek to leverage any additional supply chain information and insights, e.g. through business partner reporting, which we expect to see develop both within Europe following applicable European regulations, but also in other jurisdictions.

Affected Communities

We have not rated our impact on the surrounding communities as material. We will voluntarily be reporting on some of the projects that we have been engaged in in Vietnam as the majority of our employees are based there, and we wish to show our commitment to supporting local initiatives that impact the local communities and involving our employees. The initiative to support such projects is not stated in a policy, but it is and always has been part of the Sonion culture to support projects in the communities where we have a presence.



Community Engagement

S3-4

On June 30, 2024, Sonion organized a tree-planting initiative by planting 270 trees in the Binh Chau-Phuoc Buu Nature Reserve. This meaningful activity brought together our local management team, organizing committee, and labor union representatives from our factories in Vietnam to take tangible action toward restoring biodiversity.

Sonion has made a cash donation to the Chu Yang Sin Forest Protection Fund to support preserving natural habitats and promoting environmental conservation.

We have also donated to HOPE Specialized School, an institution that provides hearing-impaired children with education and support. This contribution will assist the school in enhancing these children's learning experience and development.

S3 Affected communities - Voluntary disclosures, not material

		Value chain			Time horizon		
		Upstream	Own operation	Downstream	Short	Medium	Long
Community engagement	Engaging with local communities on both social and environmental matters		Positive impact				

Consumers and End-users

In Sonion, we do not engage directly with the end-users or consumers, but a core driver for our business is to help people to a better quality of life by providing innovative and safe products and solutions to our customers and ultimately benefitting the users of hearing aids.

Innovation

Innovation and its positive impact on society are at the center of all activities we do at Sonion. Our innovative, energy-efficient, small components, such as microphones and balanced armature loudspeakers, enable millions of people to hear and communicate.

Product Quality and Safety

We strive to provide innovative technology and high-quality products and services that meet our customers and our own quality standards throughout their life cycle. We always operate in a manner that safeguards the quality and safety of our products and services. We are conscious of the materials and substances in our products.



Interests and views of stakeholders

ESRS 2 SBM-2

Our vision, We Help The World Listen, means that the users of the hearing aids, such as hearing care professionals and people with hearing loss, are a core part of our strategy at all times. Our products and services play a key role in supplying hearing aids to the market to the benefit of the users. We are driven by the opportunity to improve the lives of people and are obliged to ensure that the quality and safety of our products are of the highest standards.

S4 Consumers and end-users

		Value chain			Time horizon		
		Upstream	Own operation	Downstream	Short	Medium	Long
Helping the world listen	Product capabilities are instrumental to enable better hearing (incl. safety and quality measures)			■	■	■	■
Ensuring safe hearing	Adhering to regulations, performing risk assessments to ensure end-users' safe use		■	■	■	■	■

Material impacts, risks and opportunities and their interaction with strategy and business model

ESRS 2 SBM-3

When conducting our 2024 DMA, we considered end-users in all our interviews, which is natural as our products are some of the main components in the hearing aids that are used by the end users – the consumers. We identified two impacts, representing the positive outcomes the Sonion products

help enable, as well as the potential negative impact that product issues could have on an end-user. However, any negative impacts have a very limited likelihood and are not something that has been recorded at Sonion historically.



Policies

S4-1

Product Safety and Compliance

Product safety is of great importance to Sonion. We follow a strict risk management process during product development and in mass production. We continuously monitor the safety relevant parameters of our products. Our Quality Policy and Health and Safety Policy supports that all Sonion products comply with all relevant regulatory requirements. We continuously monitor updates in legal requirements and anticipate necessary changes to sustain full compliance throughout our supply chain.

To ensure our products do not contain hazardous or harmful materials, we comply with the EU Directive of 8 June 2011 on the Restriction of the use of certain Hazardous Substances (RoHS) in electrical and electronic equipment, including its amendment, 2015/863, and with the EU's regulation 1907/2006 on the Registration, Evaluation and Authorization of Chemicals. Our Environmental Law & Regulations Coordinator monitors and approves parts/materials for new products based on supplier information and testing. Lead-free alternatives have been investigated for parts containing lead under RoHS exemptions. These will be imple-

mented when appropriate from a customer perspective, and the renewal status of exemptions will be taken into account. REACH SVHC updates are closely tracked for consequences for Sonion products. Through this, it was identified that one of the additions in January 2024 is present in a customer-defined material above 0.1%. No materials were affected by additions in June 2024.

Product Quality

We are committed at all levels of the organization to delivering high-quality products to our customers. Thanks to our relentless focus on eliminating underlying causes of quality issues, a strong preventive drive during development, and strict product release procedures, we have managed to maintain long-term decreasing trend in the number of customer complaints, measured in complaints per million units sold (CPM).

Processes for engaging with consumers and end-users about impacts

S4-2

Sonion is a key partner and supplier of components to hearing aid manufacturers globally, and we do not have direct contact with the users of hearing aids where our products are incorporated. Therefore, our main effort is to ensure the best possible understanding of the end-users is obtained through ongoing dialog with our customers, supported by our own research into consumer needs, and through research and dialog with relevant other stakeholders, such as research institutions.



Processes to remediate negative impacts and channels to raise concerns

S4-3

We have structured processes for managing complaints received from customers and have a strong performance in delivering high-quality products.

Our Whistleblower Line is available to anyone, including end-users of hearing aids; however, the likelihood of receiving concerns directly from a user is very low. Sonion can create stronger end-user value through our ongoing dialog about product quality and performance with our customers.

Actions and resources

S4-4

Innovation

The innovation of Sonion products is driven mainly by R&D and product management and is based on input from our customers and their strategies and roadmaps, our own research of opportunities in the market, and our own technological advancements. Multidisciplinary teams work together to ensure that value propositions, technology, quality, products and processes are developed in synergy, helping to ensure that products are developed efficiently and that the outcomes are innovative products of high quality that are safe to use and make a difference for hearing aid manufacturers and the end-users.

Quality Management

We have internal processes to monitor key aspects of product safety, regulatory compliance, and risk management. Our overarching ambition is to maintain compliance with regulatory requirements while proactively mitigating any risks associated with product safety. We maintain a mature Quality System that assures the high quality and safety of all our products. In 2024, we

have successfully passed ISO 9001 surveillance audits performed by Bureau Veritas Certification at all major Sonion sites.



Biocompatibility

We adhere to the term “biocompatibility”, referring to the safety of the materials used in a medical device and the risk of a human experiencing an adverse reaction. There has been continued emphasis on supporting our customers with biocompatibility needs regarding MDR (EU Medical Device Regulation). As part of this initiative, we continue to roll out the production control program to ensure that all elements touching skin contact components are controlled in the production areas. Our efforts have been recognized with positive feedback during customer audits.

Governance

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Cyber Risks and Data Protection	70

Our integrity and ethical behavior are crucial for our internal culture, reputation, and relationships with our customers and other business partners. We strive to act responsibly and are committed to operating our business in accordance with the minimum standards set in our Code of Conduct, including ensuring that we have the necessary risk mitigation measures in place concerning cyber risks and data protection.

Business Conduct

We have identified seven IROs relating to Business conduct, including two topics that are specific to Sonion. We operate in a global market, and reflecting this, we have rated general business compliance as a risk, including tax, trade sanctions, fair competition and protection of confidential information/trade secrets.

We also see supply chain disruption as a potential risk and, not least, cyber risks. We have implemented appropriate policies and procedures for managing the material risks and possible impacts identified.

Processes to identify and assess material impacts, risks and opportunities

ESRS 2 IRO-1

The Impacts, Risks and Opportunities related to Business conduct that we identified as part of our DMA conducted in 2024 apply across our own locations and the geographies of our supplier base.

When conducting the DMA, Business conduct matters were a fixed topic in all dialogs and interviews, and the specific analysis included a detailed review of market presence and transactions conducted with suppliers and customers, e.g., to assess corruption risks. The assessments were informed by a location-based analysis incorporating both corruption and money-laundering risks pertaining to the relevant geographies and locations.

G1 - Business conduct and entity specific topics

Topic	Description		Value chain			Time horizon		
			Upstream	Own operation	Downstream	Short	Medium	Long
Sonion's culture	Ensuring a positive culture of pride and collaboration, where our rules are followed and we discuss challenges	Opportunity		■		■	■	■
Protecting whistle-blowers	Ensuring adequate confidentiality safeguards in whistle-blower cases	Potential negative impact		■		■	■	■
Zero tolerance on corruption and bribery	Avoiding corruption in all its forms through well-defined business processes, training and monitoring	Risk		■		■	■	■
Corruption in the value chain	Impact on people through incidents of corruption or bribery in the value chain	Potential negative impact	■		■	■	■	■
Supply chain disruption	Suppliers or deliveries impacted by disruptive events, delaying critical supplies or own ability to deliver	Risk		■		■	■	■
Business compliance	Leading the company in accordance with laws and regulations and good ethics to avoid risks	Risk		■		■	■	■
Cyber risks	Illegal IT intrusion, phishing, hacking, or extortion impacting operations	Risk		■		■	■	■

The role of the board and management

ESRS 2 GOV-1

The Global Compliance Program is managed by the Head of Compliance/General Counsel and is part of the ESG Governance Structure. Local compliance officers are appointed at all local sites to support the local managers and ensure that the global compliance initiatives are implemented consistently across Sonion.

Business conduct is on the agenda at every Board meeting, including reports on fraud and whistleblower cases to monitor compliance risks. The Compliance Program and initiatives, including risk management, are presented to and reviewed annually by the Board of Directors. The expertise of the Board and Management Team members is described on the profile pages of the GOV-1 section.

Business conduct policies and corporate culture

G1-1

The Global Compliance Program reflects our commitment to a high level of business ethics and is the basis of Sonion's ESG agenda.

The program includes our Sonion Code of Conduct, a global Whistleblower Line, and global policies and guidelines. Our values support how we do business, and our Code of Conduct provides the ethical and behavioral framework describing the minimum standards and principles that apply to all Sonion employees and our contractors and suppliers performing work for Sonion.

In 2024, we continued to review and update our policies and adopt new policies to support the Global Compliance Program, including the following policies:

- Data Ethics Policy
- Environmental Policy
- Health and Safety Policy
- People and Labor Policy
- Supply Chain Policy
- Trade Secret Management Policy

Our Code of Conduct and most policies are available in English and Vietnamese.

For a full overview of all ESG and sustainability-related policies, see page 26. The Sonion Code of Conduct and links to all our publicly available policies can be found [on our website →](#).

Compliance training

To ensure awareness and understanding of our Code of Conduct and the principles and behaviors expected of our employees, it is mandatory to participate in our compliance training program. We have different training programs to ensure that our white-collar/indirect labor force and our blue-collar/direct labor force receive suitable compliance training.

All new employees receive induction training, typically in-person or virtual sessions, including an introduction to our Code of Conduct and relevant policies. All white-collar employees are requested to complete online and in-person compliance training courses on relevant compliance topics. Our online courses are available in several languages, including Vietnamese.

In 2024, we introduced a new online training system, including a general code of conduct course, and we achieved our target of 90% completion rate with a 94% completion rate.

Our general online training courses, on average, have a completion rate of over 90% and have, in 2024, included courses on Conflicts of Interest, Trade Sanctions, Data Privacy and Cyber Awareness training.

In 2024, we held in-person or virtual compliance training sessions for white-collar employees, including our management teams, covering our Danish, Dutch, Polish, US, and China sites. These selected courses, both online and in-person, for relevant employees have included Confidentiality Awareness Training, Export Control and Trade Sanctions and Anti-Corruption & Conflicts of Interest.

We will continue online and in-person training in 2025, focusing on Anti-Corruption, Human Trafficking and Cyber Awareness. There will also be dedicated ESG training for our supply chain and procurement teams.

Compliance Training Overview 2024

Topic	Audience	Timing	Method	Completion rates
Sonion Code of Conduct – Introduction	All new employees	Ad hoc	Classroom training & introduction online for DLs.	100%
Code of Conduct – general course	All IDLs	Every other year & all new employees	Online course	94%
Code of Conduct – awareness	All DLs	Annually	Video & online questions/test	100%
Conflicts of Interest	All IDLs	Every other year	Online course	81%
Confidentiality	All new IDLs in R&D, Sales, Procurement, HR, Finance and Product Management	Ad hoc	Classroom & Teams	72%
Anti-Corruption & Conflicts of Interest	Sales & Sales Support	Every other year	Classroom	100%
Trade Sanctions & Export Control	Sales & Sales Support	Every other year	Classroom	100%
Trade Sanctions	GMT, Sales and Procurement, incl. Logistics	Every other year	Online course	85%
Global Data Privacy	HR & Finance Teams	Ad hoc	Online course	68%
IT Cyber Security Awareness	All IDLs	Monthly	Online course	87%

Abbreviations:

DLs Direct Labor/Blue collar
 IDLs Indirect Labor/white collar
 GMT Global Management Team

Accounting policy

Completion rates

Calculated by aggregating the total number of employees enrolled in the training course and dividing this by the number of employees that completed the training by year-end.

Whistleblower Line

In addition to our Speak Up policy and local grievance complaints systems (see section S1-3), we also have the Sonion Whistleblower Line, which was implemented internally in 2021 and has since 2022 been available for third parties.

All Sonion employees globally, as well as former employees, customers, suppliers, and other business partners, can use the Whistleblower Line. The Sonion Whistleblower Line is for the reporting of serious offences that may affect the Sonion Group, or that may be crucial for an individual's life or health or suspicion of such matters. The reported issues could include:

- Financial fraud
- Violation of corporate governance, for instance, bribe or distortion of competition
- Violation of work environment and work safety regulations
- Violation of environmental legislation and pollution of the environment
- Physical violence and sexual offences

The Sonion Whistleblower Line is available in several languages. Reports in the system are done through an externally hosted internet portal, and reporters may choose to remain anonymous. The Sonion Whistleblower Line is operated in accordance with the Sonion Whistleblower Policy.

In Sonion, we will not tolerate harassment, vengeful actions, or other types of sanctions against any person who, in good faith, files a report or who assists Sonion in connection with the processing and investigation of a case. No acts of retaliation will be taken against any employee who reports, in good faith, a violation or who assists Sonion with the investigation of a case. Corrective action will be taken against anyone found to have retaliated against another person, regardless of position.

We strive to ensure that all employees are aware that they can safely report concerns through our Whistleblower Line, and we have had global and especially local awareness campaigns. Employees can access the Whistleblower Line on the Sonion Intranet, from our website, and on information boards at our sites. They can also scan a QR code with their smartphone and access the site directly.

The Whistleblower Line enables employees, business partners and other stakeholders to report their concerns confidentially and anonymously. The General Counsel & Head of Compliance manages all reports received through the Whistleblower line, and our Whistleblower Policy ensures that the

investigator involved in a specific whistleblower case is independent from the chain of management involved in the matter.

We acknowledge that there may be cases which are not being reported to our Whistleblower Line.



Management of relationships with suppliers

G1-2

Our Code of Conduct governs our relationship with our suppliers. It provides the ethical and behavioral framework to support how we do business and describes the minimum standards and principles we expect from our suppliers. We expect suppliers and business partners to adhere to all applicable laws and regulations.

Our Code of Conduct is incorporated into our Supplier Sustainability Compliance (Supplier Code of Conduct), which we require all new and current top-tier suppliers to acknowledge and commit to.

Responsible Supply Chain

Sonion is committed to responsible sourcing and collaboration with suppliers and other business partners. Our business requires us to work with an extended supply chain, and we must have a reliable and responsibly operated supply chain to sustain and continue our successful business.

We only conduct business with suppliers and business partners who align with our values and share our vision of operating sustainably. We are actively engaging with our suppliers on these issues, encouraging

the integration of ESG sustainability into core decision-making and implementing leading practices for improving supply chain sustainability performance.

To support our procurement teams, we have recently updated our Supply Chain Policy. The purpose of the Supply Chain Policy is to define Sonion's approach to sourcing goods and services, including the mutual expectations between Sonion and its suppliers. Since legislation, culture and working conditions differ from country to country, our Supply Chain Policy provides a framework for aligning our supply chain activities with our values, objectives and global regulatory requirements.

We require our suppliers to acknowledge and commit to our Supplier Sustainability Compliance. With our Supplier Sustainability Compliance, we have defined the expectations for our suppliers to be uncompromising in their ethics, accountability, reliability, and sustainability practices. All new suppliers and all the current top-tier suppliers are required to sign our Supplier Sustainability Compliance. Our Supplier Sustainability Compliance is incorporated

into our standard purchase agreements. In 2024, we identified 180 suppliers as our core suppliers, and they all have acknowledged our Supplier Sustainability Compliance, completing the target that we set in 2023.

We screen all new suppliers and have audit procedures to ensure that our suppliers align with our sustainability practices and secure a reliable supply chain. During 2024, we audited 14 suppliers with 8 onsite visits and the rest as online interviews and research to ensure an adequate level of due diligence on key suppliers' structures and maturity concerning quality, economic and sustainability performance.

With our sustainability approach, we expect our suppliers to apply internal practices and processes that are equivalent to or better than those set out thereunder. We also expect our suppliers to ensure their key supply chain partners also undertake to commit to our sustainability practices detailed in our Supplier Sustainability Compliance.

For 2025, the aim is to expand our collaboration with key suppliers on ESG, focusing on

reducing greenhouse gas (GHG) emissions to support our near- and long-term reduction targets. We have set a target to select 20 suppliers based on our best estimation of carbon emissions and from high-risk categories (electronics, chemicals, rubber, plastics and metals). We will engage with these key suppliers, share our SBTi goals, request emission data for Sonion products, and align expectations on carbon emissions reduction initiatives.

We believe that preserving our forests and ensuring responsible forestry practices is crucial for the well-being of our planet, and Forest Stewardship Council (FSC) certification ensures that the paper products we purchase are sourced from responsibly managed forests. We are proud to report that all our paper suppliers are certified by the FSC.

Conflict Minerals

Sonion is aware of risks associated with sourcing conflict minerals such as tin, tungsten, tantalum and gold, also referred to as 3TG. We recognize that the trade in these minerals may finance armed conflict or contribute to using forced labor. We are

committed to ensuring we purchase these minerals from responsible and conflict-free sources only, and this commitment is stated in our Conflict Minerals Policy, which is published on our website.

We utilize the Conflict Minerals Reporting Template (CMRT) as a standardized reporting tool developed by the Responsible Minerals Initiative (RMI). The CMRT facilitates the transfer of information through the supply chain regarding the country of origin, the smelters and the refiners being utilized, and it helps promote transparency and insights that support our pursuit of a fair and sustainable minerals sourcing practice. In 2024, 98.2% of all our relevant suppliers completed the CMRT, covering 99.7% of all purchased configurations containing 3TGs.

Supply chain disruption

Our operations are exposed to a risk of delays if the materials and supplies we rely on are impacted by disrupting events in the upstream value chain.

To mitigate this risk, we ensure ongoing monitoring of especially the most critical categories and suppliers, including through

frequent dialog throughout the year, and we have also implemented supply flexibility, e.g. through dual sourcing.

As part of our 2024 DMA, we conducted an environmental analysis on 18 of our key suppliers to identify potential climate or other nature hazards to which each supplier, within their respective locations, could be exposed or biodiversity impacts they could have directly. The analysis did not uncover any current critical findings, but will serve as a foundation going forward for our dialog on ESG.

We do not currently foresee any imminent disruptions that could impact our operations or supplies to customers.

Prevention and detection of corruption and bribery

G1-3

Anti-corruption

Our manufacturing facilities are located in Vietnam, and many of our suppliers are in high-risk countries where bribery and corruption are real and significant risks. We are aware of these risks and work actively to migrate this exposure with strict internal control processes and continuing awareness training.

We have a zero-tolerance policy for any form of bribery or corruption, and we are committed to acting professionally and with integrity in all our business dealings and relationships. We expect the same behavior from any of our business partners, customers, suppliers, and any third parties working on our behalf.

Our Anti-Corruption Policy includes the basic rules on anti-corruption, setting the minimum standards and addressing the main issues, including how to avoid and handle conflicts of interest. Our goal is to prevent and detect bribery and corruption, ensuring that our business operations are conducted ethically and transparently.

The Anti-Corruption Policy is supplemented by our Gifts and Hospitality Policy, which provides information and guidelines for all Sonion employees regarding accepting or providing gifts and entertainment. Sonion employees are only allowed to give or receive gifts or hospitality that are modest, appropriate, and infrequent. Additional restrictions apply when interacting with public officials.

Anti-corruption is part of our general compliance training, and we have focused training for our management, sales, and supply teams on anti-corruption and anti-bribery; see the Compliance Training Overview.

Incidents of corruption and whistleblower cases

G1-4

We did not identify any corruption or bribery cases in 2024, and we have also not received any whistleblower reports compared to 2023 when two reports were received and handled according to the Sonion Whistle-

blower Policy and internal investigation guidelines. Sonion has not been convicted of violating anti-corruption and anti-bribery laws, nor have we received any fines.

Corruption incidents	Unit	2024	2023	2022
Convictions for violation of anti-corruption and anti- bribery laws	Number	0	0	0
Fines for violation of anti-corruption and anti-bribery laws	Amount in USD	0	0	0

Whistleblower cases	Unit	2024	2023	2022
Number of reports made through the Whistleblower Line	Number	0	2	1
Number of reports in scope of the Whistleblower Line	Number	0	2	1

Accounting policy

Convictions for violations of anti-corruption and anti-bribery laws

Conviction of a Group entity by a court of law which is determined during the financial year.

Fines for violations of anti-corruption and anti-bribery laws

Fines for a Group entity determined by a court of law during the financial year.

Accounting policy

Whistleblower reports

The number of reports received through the Whistleblower Line during the year is based on information and confirmation by our external law firm at the end of the year. The number of reports within the scope of the Whistleblower Line is the number out of the total whistleblower reports received which are in the scope of the Whistleblower Line, i.e. within the limitations of whom and what is reportable. Note that reports may concern a range of topics, including theft, bribery, fraud, violence or severe harassment.

Business Compliance

Our Code of Conduct encompasses the following topics, which are critical to outline our commitment and expectations to acting responsibly and compliantly. Our Code of Conduct is available to all employees on our intranet and our website.

Fair competition

We believe in and support fair and unrestricted competition. We aim to act independently in all our commercial decisions and win business by having the best products and delivering the best performance to our customers. Focused training is conducted for our management, sales, and supply teams to ensure compliance with all applicable competition and anti-trust laws. No issues were identified in 2024, and for 2025, we will continue to monitor our compliance in this area.

Trade compliance and export controls

In Sonion, we comply with all applicable export control, sanctions, customs laws, and regulations, including those governing sanctioned parties and export of products, services, and technical data.

All exports are handled according to the applicable laws of the exporting and importing countries. We work actively to ensure that the right controls, policies, and procedures are in place to support the lawful export of our products. Relevant Sonion employees are required to ensure such compliance within their sphere of influence and receive the necessary training. We have a sanctions screening process in place and perform sanctions checks for high-risk third parties engaging in business in countries subject to sanctions by the EU and the US.

The number of applicable trade sanctions has increased significantly during 2024, reflecting the ongoing conflicts in various parts of the world. We are monitoring the developments, have implemented the required contractual clauses, and strengthened our trade compliance processes to ensure compliance with the applicable EU and US regulations and sanctions. Dedicated training was provided for the sales teams in 2024, see the Compliance Training Overview. We will continue the close monitoring in 2025, provide relevant training, and update our process to reflect any changes.

Responsible tax management

We comply with all applicable tax laws and regulations to ensure transparency and compliance in our financial practices and reporting. Our Tax Policy covers direct and indirect taxes and encompasses all tax matters arising within the Sonion Group, including tax risks and opportunities. Our commitment to responsible tax management includes transfer pricing compliance in line with applicable best practice guidelines issued by the OECD. The Tax Policy is approved by the Board of Directors and implemented and monitored by the SVP, Finance.

Protection of rights

Our technologies, intellectual property, commercially sensitive information, and financial and physical assets are vital to our business. To safeguard our company assets, we protect them from unauthorized use and disclosure. We have implemented relevant policies and instructed and trained our employees to act appropriately to protect our company assets and only use them for business purposes.

Our Confidentiality Policy sets the guidelines for how we protect and treat confidential information. We conduct training sessions across all relevant departments to ensure high awareness of the protection of our confidential information and the confidential information entrusted to us by our customers and other business partners. The training also included the responsible use of Generative AI Tools (ChatGPT etc.). We acknowledge that there are technologies, such as Generative AI Tools, that can make it easier to complete certain tasks and bring value to our daily work, and any use of Generative AI Tools must always follow the guidelines in our Policy for the use of Generative AI Tools and Data Ethics Policy.

We spend significant effort protecting our intellectual property rights to ensure our freedom to operate and secure our development efforts and innovative technologies. In 2024, we adopted a Trade Secret Management Policy, and the new Data Ethics Policy has also strengthened our efforts and awareness of protecting confidential information and ensuring data privacy. All new employees in relevant departments have in 2024 received training on confidentiality; see the Compliance Training Overview.

Cyber Risks and Data Protection

Cyber risk and it security

Sonion depends on the availability of reliable and trustworthy information and the efficient use of information systems. We depend on numerous IT systems and the general IT infrastructure to operate efficiently across our organization and value chain. This carries an inherent risk of system errors, human errors, data breaches or other interruptions that may impact the whole organization. In addition, we may be exposed to attempts to access or steal information, computer viruses, and other digital security breaches. We are committed to protecting all information, systems, applications, networks, and devices across our business and locations from external threats that are trying to exploit any weaknesses in our physical or digital security.

We regularly check our readiness for cyber threats, incident response, data protection, and third-party risks. To ensure optimal protection, we continuously work to implement measures and controls to minimize the risks and respond to evolving threats, including data protection and third-party risks. In 2024, we implemented a comprehensive list of initiatives to enhance security

and protect our IT systems and data against hackers, including limiting access to servers/services from the outside world.

All employees must familiarize themselves with our IT Security Policy and follow our IT guidelines. We provide mandatory ongoing periodic online cyber awareness training to all users; see the Compliance Training Overview.

The performance and adequacy of our information security management system is being reviewed and approved annually by the Board of Directors and the Executive Management.

Data ethics

We are committed to handling data with high integrity and strict adherence to privacy regulations and best practices to safeguard the confidentiality, integrity, and availability of the data we process.

In 2024, the Board of Directors approved our Data Ethics Policy. This policy aims to ensure that all processes involving data handling comply with applicable legislation and adhere to the highest standards of ethics

and integrity. The policy describes how data ethics are incorporated into the use of data as well as into the design and implementation of new solutions, especially new technologies to be used for data processing within Sonion. Data is only used to support our innovation and scientific and medical understanding and ensure that we have a firm evidence base to improve our products and deliver the right products to our customers and their end users.

We ensure that employees who, as part of their work for Sonion, process personal data or are engaged in designing, procuring or implementing technologies for processing personal data receive sufficient training in the principles of data ethics. Any intended use of new technology, such as AI or profiling, will be carefully considered and include following the principles outlined in our Policy for the use of Generative AI Tools; see section on Protection of Rights.

Data privacy

We respect data privacy and protect the personal data we need to collect from our employees, customers, business partners, and other stakeholders. We are committed

to protecting personal data through security measures and have implemented global and local policies on the handling of personal data. We comply with all applicable data protection laws and regulations, including the EU's General Data Protection Regulation (GDPR), and only process personal data for business purposes.

We have dedicated data privacy training for employees processing data see the Compliance Training Overview. In 2024, we maintained a robust data security environment with no reported data breaches.



Datapoints that derive from other EU legislation

The following table of the datapoints that derive from other EU legislation as listed in Appendix B of the ESRS indicates on which page a disclosure is, or would be ("page number"), the datapoints that are not relevant to Sonion's business model ("Not relevant"), and datapoints where either the topic or the specific datapoint are not material ("Not material"). Any datapoints omitted for confidentiality purposes are marked with "Not disclosed".

Disclosure requirement	Datapoint	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Page
ESRS 2 GOV-1	21 (d)	Board's gender diversity	x	x		9
ESRS 2 GOV-1	21 (e)	Percentage of board members who are independent		x		9
ESRS 2 GOV-4	30	Statement on due diligence	x			16
ESRS 2 SBM-1	40 (d) i	Involvement in activities related to fossil fuel activities	x	x		Not relevant
ESRS 2 SBM-1	40 (d) ii	Involvement in activities related to chemical production	x	x		Not relevant
ESRS 2 SBM-1	40 (d) iii	Involvement in activities related to controversial weapons	x	x		Not relevant
ESRS 2 SBM-1	40 (d) iv	Involvement in activities related to cultivation and production of tobacco		x		Not relevant
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050			x	28
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned Benchmarks	x	x		Not relevant
ESRS E1-4	34	GHG emission reduction targets	x	x		30
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources	x			31
ESRS E1-5	37	Energy consumption and mix	x			31
ESRS E1-5	40-43	Energy intensity associated with activities in high climate impact sectors	x			31
ESRS E1-6	44	Gross Scope 1, 2, 3 and Total GHG emissions	x	x		32
ESRS E1-6	53-55	Gross GHG emissions intensity	x	x		Not disclosed
ESRS E1-7	56	GHG removals and carbon credits			x	Not relevant
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks		x		Not relevant
ESRS E1-9	66 (a)	Disaggregation of monetary amounts by acute and chronic physical risk	x			Not relevant

Disclosure requirement	Datapoint		SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Page
ESRS E1-9	66 (c)	Location of significant assets at material physical risk		x			Not relevant
ESRS E1-9	67 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		x			Not relevant
ESRS E1-9	69	Degree of exposure of the portfolio to climate- related opportunities			x		Not relevant
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil	x				Not relevant
ESRS E3-1	9	Water and marine resources	x				36
ESRS E3-1	13	Dedicated policy	x				Not relevant
ESRS E3-1	14	Sustainable oceans and seas	x				Not relevant
ESRS E3-4	28 (c)	Total water recycled and reused	x				Not relevant
ESRS E3-4	29	Total water consumption in m ³ per net revenue on own operations	x				Not relevant
ESRS 2- IRO 1 - E4	16 (a) i	Biodiversity sensitive areas	x				Not relevant
ESRS 2- IRO 1 - E4	16 (b)	Land impacts	x				Not relevant
ESRS 2- IRO 1 - E4	16 (c)	Threatened species	x				Not relevant
ESRS E4-2	24 (c)	Sustainable oceans / seas practices or policies	x				Not relevant
ESRS E4-2	24 (d)	Policies to address deforestation	x				Not relevant
ESRS E5-5	37 (d)	Non-recycled waste	x				39
ESRS E5-5	39	Hazardous waste and radioactive waste	x				39
ESRS 2- SBM3 - S1	14 (f)	Risk of incidents of forced labour	x				42
ESRS 2- SBM3 - S1	14 (g)	Risk of incidents of child labour	x				42
ESRS S1-1	20	Human rights policy commitments	x				42
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			x		42
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	x				Not material
ESRS S1-1	23	Workplace accident prevention policy or management system	x				44
ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	x				45
ESRS S1-14	88 (b), (c)	Number of fatalities and number and rate of workrelated accidents	x		x		53

Disclosure requirement	Datapoint		SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Page
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities or illness	x				53
ESRS S1-16	97 (a)	Unadjusted gender pay gap	x		x		54
ESRS S1-16	97 (b)	Excessive CEO pay ratio	x				54
ESRS S1-17	103 (a)	Incidents of discrimination	x				54
ESRS S1-17	104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD	x		x		54
ESRS 2- SBM3 – S2	11 (b)	Significant risk of child labour or forced labour in the value chain	x				55
ESRS S2-1	17	Human rights policy commitments	x				56
ESRS S2-1	18	Policies related to value chain workers	x				56
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	x		x		56
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			x		56
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	x				56
ESRS S3-1	16	Human rights policy commitments	x				Not material
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines	x		x		Not material
ESRS S3-4	36	Human rights issues and incidents	x				Not material
ESRS S4-1	16	Policies related to consumers and end-users	x				59
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	x		x		59
ESRS S4-4	35	Human rights issues and incidents	x				60
ESRS G1-1	10 (b)	United Nations Convention against Corruption	x				Not relevant
ESRS G1-1	10 (d)	Protection of whistle-blowers	x				Not relevant
ESRS G1-4	24 (a)	Fines for violation of anticorruption and anti-bribery laws	x		x		68
ESRS G1-4	24 (b)	Standards of anti-corruption and anti-bribery	x				68



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