

Doc. name Code of Conduct	Doc. owner Chief People & Sustainability Officer	Approved by Board of Directors	Doc. type Policy	Rev 4.0	Approved date 2025-07-15	Status Released
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Dynavox Group Code of Conduct

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1. Improving the world with solutions for a better life

Dynavox Group provides life changing and revolutionary benefits to people with disabilities and the world around them. The world is filled with people in need of assistive communication. Our mission is to empower people with disabilities to do what they once did, or never thought possible. We do this in a professional, friendly and collaborative way on a global scale. Our goal is to make a real difference by creating solutions that help people communicate with their environment in order to live richer and more independent lives.

We work hard every day to improve people's lives. We are determined to act sustainably and responsibly, and to use this position to be a positive force in the world, both today and for future generations.

1.1 Our values

Dynavox Group is an international company that nurtures a welcoming, friendly atmosphere and non-hierarchical mindset. Our values are reflected in everything we do and help us create a unified approach to central principles that guide our actions.

- Collaborative: we treat others how they want to be treated and find the best solutions together.
- Considerate: we seek out and humbly consider diverse perspectives from our colleagues and customers.
- Curious: we listen actively, ask questions, share ideas, and learn constantly.
- Courageous: we make decisions, finish what we start, learn from our mistakes and embrace feedback.

1.2 Why do we have this Code of Conduct?

We are committed to conducting our business fairly, honestly and openly, with integrity, and in compliance with the applicable laws of all the countries where we do business. As a company with global activities, Dynavox Group must comply with laws of various countries. Many of these laws may differ from the laws in a home country of a Dynavox Group employee. In the event local practice for any reason differs from a Dynavox Group policy, our general guideline is to adhere to the more conservative or "highest practices" standard. It is also essential to be aware of, and act in compliance with, laws of your own country that apply to business activities in other countries.

At Dynavox Group we are committed to conducting our business in alignment with the highest ethical standards and applicable laws, and we want to create a culture of involvement and responsibility, as well as respect and caring for other people. The purpose of this Code of Conduct ("the Code") is to describe those ethical principles that should guide Dynavox Group actions.

1.3 The Code applies to everyone in the company

The Code applies to everyone who works for Dynavox Group, or for any of its subsidiaries (collectively "Dynavox Group" or "Company"). This includes any employee or consultant with access to Dynavox Group systems and premises, and all employees must explicitly certify that they will comply with this policy.

The Code consists of this document including several policies related to the Code. An overview including specific compliance information per policy is found in Appendix 1 (Responsibility to Read and Certify Policy Compliance).

For new employees, the Code will be communicated as part of their introduction program as a live training as well as a mandatory e-learning certification training followed by bi-annual update of the certification through renewed e-learning. The HR department at Dynavox Group is responsible for maintaining processes and execution and follow-up of trainings. The consequence of not completing

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the training could potentially result in dismissal. Significant updates of the Code are communicated either in the bi-annual e-learning trainings or by e-mail to all employees when approved.

1.4 Your responsibility under the Code

The Code shall be rigidly observed. Perceived pressure from supervisors or demands due to business conditions are not an excuse for violating the Code. It is also important to point out that any activity which violates the law or violates the Dynavox Group policies and procedures, even if believed to “help” the Company, is in fact directly contrary to the interests of the Company. Additionally, those acts create a risk of criminal or civil penalties, undermines our Company’s reputation for honesty and integrity, and therefore harms the Company and what we stand for. Violations of the Code may constitute violations of law which may expose both an individual and the Company to criminal and civil penalties. Violation of the Code will subject an employee to severe disciplinary action, up to and including dismissal.

It is the responsibility of all employees to:

- read and understand Dynavox Group Code of Conduct
- know how and where to report integrity concerns and promptly report all suspected violations of the Code
- complete necessary trainings related to business ethics at Dynavox Group

1.5 Foundation of our Code

It is Company policy that its employees, agents and other business associates shall act as responsible members of society, and this Code is based on international conventions.

Dynavox Group is committed to:

- supporting and respecting universal human rights both generally and in particular within our sphere of influence, within the communities where we operate, and with respect to parties with whom we do business.
- promoting equal opportunity for our employees at all levels of the Company with respect to race, gender, age, sexual orientation, ethnicity or religious beliefs, and operate without unacceptable worker treatment such as the exploitation of children, physical or psychological punishment, involuntary servitude, or other forms of abuse.
- respecting our employees’ right to voluntary freedom of association.
- accepting that employee compensation should enable employees to, minimally, meet their basic needs. Employment should provide opportunities for employees to improve their skills and capabilities, in order to raise their social and economic opportunities.
- providing a safe and healthy workplace; protect human health and the environment; and promoting sustainable development.
- promoting fair competition, uphold the highest standard in business ethics and integrity, and not offering or accepting bribes.
- promoting work in communities in which we do business to improve the quality of life in those communities.
- promoting the application of this Code by those with whom we do business.

1.6 Raising integrity concerns

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If an employee knows of, or suspects, any unlawful or unethical situation or has any questions about this Code of Conduct, it is their responsibility to immediately raise these concerns and report whatever they know up the line.

An employee may report any accounting allegation, legal allegation or retaliatory act or suspicion of wrongdoings through Whistle B, our third-party whistleblowing service aimed at reporting and handling suspicion of wrongdoing and complaints confidentially or anonymously. Please visit [Whistle B, Whistleblowing Centre](#) to report any wrongdoings as defined above.

Employees wanting to report any suspicion of wrongdoing can also do this by making a complaint to governmental authorities, in countries where this is legally required.

You should acquaint yourself with this policy and read it thoroughly if and when you want to make a report as a whistleblower.

Read more in our Whistleblower Policy on our policy page [Policies Documents \(sharepoint.com\)](#)

2. Employer policy: Dynavox Group as an employer and workplace

2.1 Fair employment, diversity & inclusion, commitment to health & safety

The Employer Policy sets the minimum standards for the Company as an employer. The standards are based on a number of international declarations and conventions. However, as a responsible and attractive employer, Dynavox Group regards the standards in these declarations and conventions as minimum levels rather than as goals for Dynavox Group's employee relations ambitions. Dynavox Group's own standards and ambitions are set in this document, and in the employee handbook which is adapted to local regulations and practice in each country where Dynavox Group operates. Those documents should be read in conjunction with this policy.

Dynavox Group's Employee handbook regarding this policy includes:

- a commitment to a safe and healthy work environment including but not limited to fire, accidents and toxic substances.
- a commitment to provide a sanitary infrastructure
- employment terms and conditions
- elimination of discrimination, sexual harassment or other forms of harassment
- equal opportunities plan and Gender Policy

2.1.1 Zero tolerance of discrimination, sexual harassment or other forms of harassment

Dynavox Group requires all of its employees to treat each other, regardless of title or position, with fairness and the respect necessary to maintain a diverse place of employment that encourages each person to contribute to their fullest potential.

We will not tolerate any harassment or employment discrimination based on race, color, gender, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, family responsibilities, age, veteran status or disability, in line with the ILO conventions 100 and 111. Every person conducting business on Dynavox Group's premises, whether or not employed by Dynavox Group, must refrain from engaging in any verbal or physical

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conduct that could be construed as sexual or any other form of harassment. If this occurs the employment may be immediately terminated.

All Dynavox Group employees are encouraged to report conduct that may constitute harassment to their direct manager, the Human resources department, or to the Whistleblower investigators, as described in section 1.6. No individual will suffer retaliation for reporting in good faith any incident of harassment or discrimination, for making a complaint or for participating in any investigation.

Hiring, remuneration, benefits, training, advancement, discipline, termination, retirement or any other employment-related decisions shall be based on relevant and objective criteria only.

2.1.2 Workplace violence prevention

Dynavox Group is committed to providing a safe, violence-free workplace. We discourage all team members from engaging in any physical confrontation with a violent or potentially violent individual or from behaving in a threatening or violent matter.

Threats, threatening language or any other acts of violence or aggression towards any employee will not be tolerated.

Guns or any other form of weapon is not tolerated on company premises or at company-sponsored functions.

Violations of this by an employee will result in disciplinary action, up to and including dismissal.

2.1.3 The Company's right to search

To ensure our employees' and customers' safety, and to protect our legitimate business interests, the Company reserves the right to question and inspect or search any employee or other individual entering or leaving company premises or job sites. The inspection or search may include any packages or items that the individual is carrying, including briefcases, handbags, or knapsacks. For employees this may include office desks, lockers or other storage devices.

These items are subject to inspection and search at any time. We also may require employees to agree to reasonable inspection of their personal property and/or person while on the job or on the Company's premises.

The individual may be asked to inspect their own personal property or person by displaying the contents of any packages and/or turning out their pockets in the presence of a representative of the Company, typically a management employee of the same gender. Refusal to submit to such a search could result in dismissal.

2.1.4 No forced labor

Dynavox Group will not use, be complicit in, or benefit from, forced labor, including bonded labor, forced prison labor, slavery, servitude, or human trafficking. Pay and other employment terms, including working hours, should at the minimum be in line with national laws and local industry standards.

Labor should be freely given, and employees should be free to leave in accordance with established rules. Consequently, we will not withhold any part of any employee's salary, benefits, property or documents (e.g. identity cards and travel documents) in order to force such an employee to continue working for Dynavox Group.

2.1.5 No child labor

No person below the minimum legal age for employment should be employed at Dynavox Group. In accordance with the convention, the minimum age for admission to employment or work must not be less than the age for completing compulsory schooling, or less than 15 years. Lower ages are

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permitted for transitional periods (or 14 years, where established by national laws in accordance with the ILO developing-country exception). The minimum age for hazardous work is 18 years for all countries¹.

2.2 Protection of company assets and open communication

All Dynavox Group employees should protect the Company's assets, both tangible and intangible, and ensure their efficient use. Tangible assets include office space and office equipment. Intangible assets include images, patents, trademarks, copyrights, and trade secrets. All Company assets should be used for legitimate business purposes only. Unauthorized use or dissemination of information can cause significant harm to our company's business or reputation, in addition to the individuals and business partners whose data we are responsible for safeguarding.

2.2.1 Information Policy

Dynavox Group seeks to maintain an open culture with transparency and broad information sharing internally. Ensuring that we all have a good understanding of our business and up-to-date information relating to this is an important motivation and helps us all take better decisions in our daily work. Furthermore, strong external communications such as social media activities, press contacts, etc. build value for the Company.

The Information Policy is intended to facilitate open internal communications and strong external communications, but also to guide us in how we should do this to avoid negative effects. All information disclosures must therefore be in accordance with the rules set forth in the Information Policy.

Our Information Policy ensures that internal and external Dynavox Group communications are accurate, relevant, clear, effectively managed, responsive to the information needs of the Company, and in compliance with all applicable laws and regulations.

As a public company with shares listed on a stock exchange, it is of critical importance that inside information that is, or could be, affecting the valuation of the share is not disclosed without the approval of the Dynavox Group Board of Directors or CEO, and when such information is disclosed, it will be done through a widely distributed press release.

The Information Policy is an integral part of this Code and shall be read by all employees who shall also certify that they will comply with the policy.

Read more in our Information Policy

2.2.2 Information Security Policy

The Information Security Policy sets out Dynavox Group's management commitment to, and governance of, information security as well as your responsibility. It includes our confidentiality classification and handling, information security inside and outside the offices and our procedures for reporting information security incidents and risk.

This policy must be read by all employees and consultants with access to Dynavox Group systems and premises, and all employees must certify that they will comply with this policy.

Read more in our Information Security Policy.

¹ ILO Code of Conduct

2.2.3 IT Acceptable Use Policy

The IT Acceptable Use policy is subordinate to the Information Security Policy and contains detailed and important policy statements about how Dynavox Group's Information assets and supporting IT resources may be used and how they must be protected. It should be read by all employees and consultants including external parties with access to Dynavox Group Information resources.

The IT Policy and Acceptable Use document is subordinate to the Information Security Policy and contains detailed and important policy statements about how Dynavox Group's Information assets and supporting IT resources are to be used and how they must be protected. It should be read by all employees and consultants including external parties with access to Dynavox Group Information resources and provides guidance on:

- acceptable use of corporate computers, networking and information systems.
- policies on purchasing and acquiring computer and information systems
- policies on how to obtain support for systems
- policies and guidelines for systems in operation

Read more in our IT Acceptable Use Policy (internal only).

2.2.4 Intellectual property rights of others

It is Dynavox Group's policy to not knowingly infringe upon the intellectual property rights of others. Whether preparing advertising copy or promotional materials, using the name, trademark, logo or printed images belonging to another company, each employee must ensure that the use of the trademarks, copyrighted materials and other intellectual property of others is done properly and only with permission. We must also bear in mind that the Company uses third party software that is generally subject to license agreements. Software must therefore not be copied, transferred or used except as provided by an applicable license between the Company and such third party.

Finally, no employee should disclose to the Company or be asked by the Company to reveal confidential, proprietary or trade secret information of others. More specifically, employees are not permitted to use or disclose:

- improperly obtained confidential, proprietary or trade secret information belonging to a third party.
- confidential, proprietary or trade secret information for which the employee is bound by confidentiality obligations to a third party (for example, such information of a former employer).

2.3 Accurate and complete financial records and reports

Dynavox Group's internal accounting controls are intended to safeguard the assets of the Company and to ensure the accuracy of its financial records and reports, which form the basis for managing Dynavox Group's business and fulfilling our obligations to shareholders, employees, and regulatory authorities. These records must properly, accurately and completely reflect that all transactions are made in accordance with law and be promptly entered on the Company's books. These records may include financial records, product test documents, research reports, service records, legal contracts, expense reports, time cards, personnel files and status reports.

The responsibility for ensuring accurate accounting records resides not only with finance and audit personnel but with all Dynavox Group employees. No person may interfere with, or seek to improperly influence, directly or indirectly, the accuracy, completeness or auditing of such records.

All reports made for internal use and sent to the Board of Directors as well as to shareholders and authorities must be full, fair, accurate, timely and in accordance with legal and financial reporting requirements.

Employees must follow company procedures for retaining and disposing of records. Under no circumstances are Dynavox Group records to be destroyed selectively or to be maintained outside Company premises or designated storage facilities.

Employees are expected to report any complaints or concerns regarding accounting, internal accounting controls and auditing matters promptly. Reports can be made to the Chief Financial Officer or the Chairman of the Dynavox Group Audit Committee, and can be made anonymously via the Whistleblower process described in section 1.6 above. No one will be subject to retaliation because of the good faith report of a complaint or concern regarding accounting issues.

3. Dynavox Group in the marketplace

3.1 Conflict of interests

All employees are committed to act in the best interests of Dynavox Group. All employees must promptly disclose any personal or professional interest that might be perceived to conflict with the best interests of Dynavox Group.

Conflicts of interest result from situations or activities which may benefit an employee by virtue of their position with, or at the expense of, the Company. Employees must avoid situations where their personal interests could conflict with, or even appear to conflict with, the interests of the Company. This also applies to family members, including an employee's spouse, children, parents, siblings, in-laws (i.e. mothers- and father-in-law; sons- and daughters-in-laws, brothers- and sisters-in-law) and anyone who shares such a person's home. We should avoid any relationship or activity which might impair, or appear to impair, our ability to make objective and fair decisions when performing our jobs.

Having a conflict of interests – or the appearance of a conflict of interests – is not a violation of the Code of Conduct in itself. However, your failure to disclose the potential conflict promptly is a violation and may lead to disciplinary action.

3.1.1 Outside work activities forbidden

Company policy forbids employees from serving as directors, officers, partners, employees, consultants, agents or representatives of business enterprises organized for profit (other than those affiliated with Dynavox Group) without specific approval from the employee's manager.

3.1.2 Avoid personal financial interest

Employees should avoid any outside financial interests that might conflict with Dynavox Group's interests. Such outside interests could include, among other things:

- personal or family financial interests in, or indebtedness to, enterprises that have business relations with Dynavox Group, or enterprises that are direct competitors of Dynavox Group. An investment of 1% or less in the capital stock of such an entity may be disregarded.
- acquiring any interest in outside entities, properties, or similar, in which the Company has an interest or clear potential interest. This would include stock in a business being considered for acquisition. This prohibition extends to tip-offs to people outside of Dynavox Group.

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3.1.3 Policy for Related Party Transactions

At Dynavox Group, we recognize the importance of handling transactions with related parties in a transparent and responsible manner. Related party transactions involve dealings with individuals or entities that are closely connected to Dynavox Group, such as significant shareholders, board members, executives, and their immediate family members, or companies controlled by them.

Our approach is based on ensuring that these transactions are conducted on fair market terms and are fully compliant with all applicable laws, including the Swedish Companies Act. We aim to minimize any risk of conflicts of interest and maintain the trust of our stakeholders.

To achieve this, we have established the following key principles for related party transactions:

- **Pre-approval requirement:** All related party transactions must be submitted for pre-clearance to the CFO before they are executed.
- **Fair market terms:** Transactions with related parties should always be conducted under market terms, ensuring that the terms are comparable to those offered by third parties.
- **Board oversight:** The Board of Directors holds the ultimate responsibility for ensuring that all related party transactions follow applicable laws and company policies. The CFO manages the approval process and ensures continuous reporting.
- **Material transactions:** If a related party transaction exceeds SEK 1 million or 1% of the company's market value, it is considered a material transaction and must be approved by the general meeting.
- **Annual review:** All related party transactions are subject to an annual review to ensure compliance and continued alignment with business objectives.
- **Exemptions:** Certain transactions are exempt from the policy, including intra-group transactions and those approved by the general meeting.

By following these guidelines, we ensure that all related party dealings are managed fairly and transparently, protecting the integrity of our business.

Read more in our Policy for Related Party Transactions (internal only).

3.2 Inside information and insider trading

Inside information is material non-public information that if disclosed might influence a person's decision to buy, sell, or hold a company's securities such as shares, bond or options. Examples of inside information may include unannounced awards to vendors, unpublished information about new products or services, projections of future earnings or losses, changes in personnel, mergers and acquisitions. Trading on such information or providing it to someone else gives unfair advantage to people "in the know" and could be a violation of the law.

Keep in mind:

- You might come into possession of inside information in your day-to-day job about Dynavox Group or other companies (e.g. customers or suppliers). Trading shares or bonds or options while possessing inside information is both unethical and illegal.
- It is against law to disclose inside information with other people, including family members, friends or colleagues, unless necessary for your work.

If you are unsure whether you have inside information contact the Chief Financial Officer.

All employees, consultants, board members with access to Dynavox Group's systems and premises must read and comply with the Insider Trading Policy. All Dynavox Group Employees and board members are individually responsible for abiding by all external rules, laws, and regulations regarding

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the possession of, dealing with, and trading related to, Inside Information. The Insider policy should be read in conjunction with the Information Policy.

Read more in our Insider Policy.

3.3 Respect for fair competition

Dynavox Group's activities are governed by competition laws (known in the United States as "antitrust" laws) and trade regulation laws. It is important for us to understand these laws and regulations and to make sure we are in full compliance with them. Failure to comply with the competition laws, especially those aimed at agreements between competitors, could subject Dynavox Group and individuals involved to criminal fines and jail terms, as well as to potentially large damages.

At Dynavox Group, we are committed to a policy of lawful competition that is based on the merits of our products and services. We seek to maintain the trust of our customers and suppliers by conducting business in a fair and ethical manner. Some basic guidelines for competing fairly and ethically are:

- do not enter into any agreements (written or oral) or reach any formal or informal understandings with competitors to establish, or otherwise affect, prices charged to customers or paid to suppliers.
- do not enter into any agreements (written or oral) or reach any formal or informal understandings with competitors to divide customers, territories or markets, whether by product, service, geography, or by any other means.
- do not interfere with contracts made between a prospective customer and a competitor.
- never engage in industrial espionage, sabotage or bribery.
- we may promote our products and services through fair and accurate comparisons with our competitors. We do not engage in unfair, misleading, or inaccurate comparisons.
- be accurate and truthful in all dealings with customers and be careful not to misrepresent the performance, features or availability of our own products and services or those of our competitors.
- at industry events, take special precautions when encountering competitors to avoid discussions about pricing or customers (either ours or theirs).

3.4 Responsible trade

To ensure responsible and legal international trade customs and export control laws and regulations that sets the requirements for importing and exporting both physical goods and non-physical must be followed. Trade laws and regulations cover areas such as rules of origin, customs classification of goods, customs valuation, export control classification, export license management, restricted party screening, embargos and sanctions. Dynavox Group's Export Control Policy shall guide Company employees who are involved in the export business. Employees in Sales and Logistics must specifically certify that they will comply with this policy.

Read more in our Export Control Policy, as well as our customs procedures, export control procedures, internal processes and compliance intranet pages.

4. Dynavox Group relative to the world around us

4.1 Zero tolerance for corruption, bribery, extortion and money laundering

We compete for business strictly on merit. No Dynavox Group employee may either directly or indirectly accept, give or offer anything of value to or from any private person, governmental official or charitable or political organization that could influence or be perceived to influence any of our business decisions. We are prohibited from giving an advantage or benefit in order to induce the recipient at other companies, organizations or authorities to perform their work duties improperly.

Dynavox Group opposes all forms of money laundering and takes steps to prevent our financial transactions from being used by others to launder money.

Keep in mind:

- bribery, corruption and improper payments can take many forms including gifts, entertainment or hospitality, payments made through third parties or donations
- gifts, entertainments and hospitality can be offered only in accordance with Dynavox Group's Anti-Corruption Policy, employee handbook, and local law
- you are responsible to follow laws in the countries where you do business, check with Dynavox Group's legal department if you are uncertain

Watch out and report any red flags immediately to Dynavox Group's CFO.

Our commitment to integrity is constant when dealing with both government and commercial customers. However, as a supplier to government agencies worldwide, we must abide by special requirements not usually found in the private business sector that have been established to protect the public interest. All Dynavox Group employees dealing with government contracts must keep informed of changes and seek help whenever there is any doubt regarding appropriate behavior. It is the responsibility of these associates to make sure that the Company meets the terms and specifications of all government contracts. Failure to do so can carry serious legal penalties, both for Dynavox Group and for the individual.

The Anti-corruption policy must be read by all employee and consultant with access to Dynavox Group systems and premises, and all employees must explicitly certify that they will comply with this policy.

Read more in our Anti-Corruption Policy.

4.2 Commitment to Environmental responsibility

At Dynavox Group we recognize the challenges linked to climate change and the effects it can have on the environment. We therefore strive to reduce our own climate footprint in several areas and run our business in an environmentally sustainable way. The Environmental policy contains statements on Dynavox Group's commitment to environmental responsibility, protection of the environment and prevention of pollution. The policy must be read by and complied to by all employees.

Read more in our Environmental Policy.

4.3 Responsible Sourcing

Dynavox Group's Supplier Code of Conduct requires all suppliers to respect human rights in the spirit of internationally recognized standards including ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights. The Supplier Code of Conduct illustrates the ethical, business and environmental standards according to which Dynavox Group

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Suppliers shall operate globally. It covers anti-corruption, human and labor rights, environment and health & safety. It is mandatory for all Dynavox Group suppliers to comply to the policy. Throughout the year we also audit a sample of our suppliers.

The Dynavox Group Board of Directors has adopted a Supplier Code of Conduct aligned with the applicable standards set out by the Responsible Business Alliance (RBA).

All Dynavox Group employees in sourcing and purchasing shall read this policy.

Read more in our Supplier Code of Conduct Policy..

4.4 Consequences of Non-Compliance

Consequences of Non-Compliance with this code of conduct can have serious consequences for both the organization and individuals involved. All employees are expected to adhere to all sections of this code of conduct to avoid the following potential consequences:

- **Disciplinary Action:** Non-compliance may result in employee disciplinary measures, including verbal or written warnings, performance improvement plans, suspension, or termination of employment.
- **Legal Repercussions:** Non-compliance with Dynavox Group Code of Conduct can lead to legal action against the organization and potentially individuals, including, but not limited to, fines and penalties.
- **Financial Impact:** Non-compliance may result in financial losses to the company.
- **Erosion of Trust:** Failure to adhere to this Code of Conduct can erode trust between the organization and its customers, employees, and partners.
- **Loss of Access:** In some cases, non-compliance may result in the loss of access to data, systems, or partnerships critical to business operations.

5. Way forward

This Code applies to all of at Dynavox Group and should guide all daily work. It is the responsibility of all employees to read the Code of Conduct, regularly use it for reference and react to any breaches. Employees are also responsible for following any policies relevant to their position and work. Values, policies and procedures and leadership model can be found on the company Intranet.

This Code cannot cover all situations an employee may face and sometimes the right way to act is not obvious. Employees are encouraged to ask questions and to ask for help.

Appendix 1 Responsibility to Read and Certify Policy Compliance

<u>Document name</u>	<u>Read by</u>	<u>Specific compliance certification from</u>	<u>Document owner</u>
Code of Conduct	All	All	Chief People & Sustainability Officer
Whistleblower Policy	All	None	Chief People & Sustainability Officer
Information Policy	All	All	Chief Marketing Officer
Information Security Policy	All	All	Head of IT
IT Acceptable Use Policy	All	All	Head of IT
Insider Policy	All	All	Chief Financial Officer
Policy for Related Party Transactions	All	All	Chief Financial Officer
Export Control Policy	Sales, Logisitcs, Order mgmt	Sales, Logistics, Order management	Chief Operations Officer
Anti-Corruption Policy	All	All	Chief Operations Officer
Environmental Policy	All	All	Chief People & Sustainability Officer
Supplier Code of Conduct	Suppliers, Purchasing	All suppliers	Chief Operations Officer

Dynavox Group NOTE: The fact that an employee is not required to certify compliance with a specific policy does not exclude this employee from actually complying with that policy, should the employee enter into a situation where that policy becomes applicable for them. All abovementioned policies are also available at the Dynavox Group intranet and as part of the e-learning system.

Appendix 2 Decision matrix (RAPID)

When updating the Code of Conduct we use the decision method RAPID to ensure the right stakeholders are involved in the process, as per the below table:

<u>Document name</u>	<u>Recommender</u>	<u>Inputter</u>	<u>Decider</u>
Code of Conduct	Chief People & Sustainability Officer	CEO, Chief Operations Officer, Document owners within Code	Board of Directors
Whistleblower Policy	Chief People & Sustainability Officer	CEO, CFO	Board of Directors
Information Policy	Chief Marketing Officer	Chief People and Sustainability Officer, Head of IT, Corporate Communications Director	CEO
Information Security Policy	Head of IT	CEO, Corporate Communications Director	Board of Directors
IT Acceptable Use Policy	Head of IT		CEO
Insider Policy	Chief Financial Officer	CEO, Corporate Communications Director	Board of Directors
Policy for Related Party Transactions	Chief Financial Officer		Board of Directors
Export Control Policy	Chief Operations Officer	Head of Fulfillment & Logistics, Head of Supply Chain, Head of Sourcing	CEO
Anti-Corruption Policy	Chief Operations Officer	CEO, Chief People and Sustainability Officer, CFO, President Sales, Head of Sourcing	Board of Directors
Environmental Policy	Chief People & Sustainability Officer	Chief Operations Officer	CEO
Supplier Code of Conduct	Chief Operations Officer	Sourcing managers, Head of Legal	CEO