Hidden Hearing – Modern Slavery Statement

Introduction

Hidden Hearing is committed to being a responsible employer and will seek the same from its suppliers.

Organisational structure and supply chains

Hidden Hearing is a private hearing aid specialist with more than 50 years' experience and over 300 locations nationwide. The Head Office is in Maidstone, Kent and the organisation is owned by Demant A/S, a quoted, Danish, vertically integrated hearing healthcare group.

Hidden Hearing has approximately 650 employees in four main categories, Hearing Aid Dispensers, Branch Coordinators and Contact Operations employees, Support and Management. We use some temporary agency staff whom we engage through an approved list of recruitment agencies. The majority of products we sell are manufactured by Demant in Poland. We purchase other goods and services from a range of providers, the four largest in terms of budget spend being shop rentals, cars, IT and marketing services.

The business operations of Hidden Hearing consist of the following:

- Operation of hearing healthcare clinics, including hearing testing, rehabilitation services, the supply of hearing devices and associated accessories to individuals and ear wax removal;
- Operational support for the above activities.

All our Hearing Aid Dispensers are registered with the Health and Care Professions Council which has a professional code of conduct. Our Hearing Aid Dispensers and Ear Care Practitioners all require a current DBS check as to relevant support function employees and all Directors.

Countries of operation and supply

The operations of Hidden Hearing are based in England, Scotland and Wales and are supported by the Demant Group globally.

About Demant

Demant was founded on high ethical standards. Through their business ethics programme, we contribute to eliminating bribery and corruption, and our business areas and company brands are guided by individual quality policies and robust processes that ensure the highest level of product quality and safety.

Ambitions



Demant's values work to create a culture where everyone can belong, grow and contribute. The people in Demant are the most valuable part of our business, and their well-being, safety, engagement and development is fundamental to our success.



The Demant Group is headquartered in Denmark and operates globally, with companies registered in more than 30 countries[1] and products and services sold in 130 countries. In the 2024 reporting period Demant Group's global workforce grew to over 22,000 employees, of which approximately 650 people were employed by Hidden Hearing.

In this Statement, Demant's global operations are referred to as the ***Demant Group***, and Hidden Hearing is a reporting entity for the purposes of the Modern Slavery Act 2015.

The Demant Group protects labour rights and promotes safe and secure working environments for all employees by supporting freedom of association for workers, ensuring responsible purchasing practices, conducting human rights risk assessments with new suppliers

The Demant Group is committed to respecting human rights and dignity for all as stated in the Demant Group Sustainability Policy. Where local legislation does not provide direct protection for human and labour rights, the Demant Group applies the Ten Principles of the UN Global Compact, principles from the Universal Declaration of Human Rights, ILO's Declaration of Fundamental Principles and Rights at Work, and Demant Group's portfolio of global policies and guidance within business ethics.

The Demant Group reports annually on its actions and initiatives based on the UN Global Compact Ten Principles in the four areas of human rights, labour rights, environmental and anti-corruption actions. The Demant Group has also appointed compliance champions in business ethics across its workforce.

Supply Chain

The Demant Group manufactures its products in Poland, Mexico, and Denmark. Where necessary, the Demant Group sources other products, consumables and components from manufacturers based in Europe, the United Kingdom, the United States, Asia, the Middle East and the East Pacific region.

The direct suppliers that the Demant Group collaborates with are mainly manufacturers of electromechanics, electronics, mechanics, production consumables and material supporting packaging and marketing activities.

In addition to the above supply chains, Hidden Hearing sources goods and services from local suppliers to support the organisation, including IT equipment/applications, transport/logistics, property maintenance, professional services, office equipment and supplies, marketing production support, insurance and travel services.

[1] Australia, Belgium, Brazil, Canada, China, Denmark, Finland, France, Germany, Greece, Ireland, Malaysia, Mexico, Norway, Netherlands, New Zealand, Italy, Japan, Korea, Philippines, Poland, Singapore, South Africa, Spain, Sweden, Switzerland, Turkey, UK and the USA.

Risks and actions taken

As part of the process of preparing this Statement, Hidden Hearing undertook a risk assessment to identify modern slavery risks in its supply chains. We assess risk using the Slavery and Trafficking (SaT) Risk Assessment template. The most recent assessment was carried out by the Head of Human Resources and the Managing Director in April 2025. We will review, at least annually, how we operate in the light of this assessment to ensure the embedding of respect for human rights and zero tolerance of modern slavery.

Hidden Hearing acknowledges that its supply chain is global and complex, and as a result there are challenges in maintaining oversight of the overall supply chain (especially below the direct suppliers). However, the Demant Group has systems and controls in place to make sure that our products meet legal and regulatory requirements. As a result, Demant Group has visibility of all direct suppliers as well as the critical sub-suppliers' suppliers.

In terms of products supplied to Hidden Hearing by other Demant Group entities, we consider the most significant source of potential risk of modern slavery within our supply chain to be those suppliers that provide electronic components and precious metals.

Beyond this, Hidden Hearing pay above national minimum wage and comply with UK Employment Law.

Further, Hidden Hearing is committed to providing a safe and healthy working environment for all employees and visitors, so far as reasonably practicable. A workplace Health & Safety management framework has been developed and implemented to ensure:

- Hidden Hearing meets its legal obligations in line with the Health and Safety at Work Act 1974 and relevant codes of practice; and
- Ensures that employees are aware of their responsibilities under the above act through communication and training activities.
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As a global business that engages suppliers all over the world, Demant is attentive to how it interacts with its suppliers. The Demant Group requires that its direct suppliers comply with the Demant Group Third Party Compliance Code (TPCC), launched in 2019.

Third Party Compliance Code, Business Ethics Framework and Assessment of Effectiveness

The focus of the Demant Group's modern slavery compliance activity and due diligence are undertaken in relation to supply chains for products supplied to Hidden Hearing by other Demant Group entities globally. The Demant Group continues to work with its direct suppliers to ensure they are aware of, and take steps to address, the modern slavery risks associated with their operations and supply chains.

The TPCC forms part of Demant's compliance and business ethics programme, which is an integral element of Demant's broader sustainability strategy.

The TPCC describes international standards and specific criteria which govern aspects of human and labour rights, including forced labour, child labour and young workers, freedom of association and non-discrimination, health and safety measures, environmental protection, privacy and ethics, as well as bribery and corruption. It also requires direct suppliers to adhere to social and environmental standards and contribute towards the protection of human rights. By complying with the TPCC, our direct suppliers are committing to ensuring that their own operations and supply chains address any modern slavery risks. The collection of documentation required from suppliers across our global supply chain remains ongoing.

To assess our effectiveness in this area, the Demant Group will continue to closely monitor our suppliers' compliance with the TPCC, and investigate any perceived, potential or actual issues that arise. To date, the Demant Group has not identified any material incidents of non-compliance with the TPCC or modern slavery practices.

In 2020, Demant launched the Demant Group Code of Conduct and the Demant Group Whistleblower Policy, including a Whistleblower Hotline and support system. The Demant Group Code of Conduct and the Whistleblower system

have both been adopted by Hidden Hearing. These two policies, together with the TPCC, represent the framework of Demant's global business ethics compliance programme.

The Demant Group Code of Conduct includes principles on a range of compliance matters, including human rights, anti-corruption, the environment and the workplace environment.

The Whistleblower Hotline enables employees, business partners and other stakeholders to confidentially report any matters of serious and sensitive concern, with the option to do so anonymously. This channel is intended to improve and increase transparency, both within and outside the business, and is therefore a further mechanism by which our effectiveness in this area can be assessed.

The Whistleblower Hotline is a global hotline reporting system operated by an external system provider, EQS Group. At a global level, the Whistleblower Hotline is governed by a Whistleblower Unit consisting of designated employees from Group Legal & Compliance. All whistleblower reports are handled by the Whistleblower Unit, which determines the appropriate course of action. Where required, investigations are conducted and may be reported (subject to the terms of the global Whistleblower Policy) to the board of directors in line with the local Whistleblower Policy (which incorporates the global Whistleblower Policy). The Whistleblower Unit reports all whistleblower cases to Demant's audit committee, and Demant's executive management receives information and ad hoc reports when this is deemed appropriate.

Consultation

During the reporting period covered by this Statement, engagement and consultation included a discussion of reporting requirements, providing information regarding actions taken or intended to be taken to address these requirements, and providing relevant materials and updates as appropriate.

Specific actions and steps taken include:

- noting similar and related compliance programs and activity across the Demant Group globally, actively engaging with and consulting Demant Group legal, compliance and business ethics representatives for input; and
- providing a copy of the draft Statement to all directors for input prior to its finalisation.

Further, input was sought as appropriate from other relevant stakeholders at Demant A/S.

Responsibility

The Board of Directors of Hidden Hearing is responsible for the development and review of policies.

The responsibility for risk assessment in the context of human rights and modern slavery has been delegated by the Board to the Head of Human Resources.

Responsibility for investigations/due diligence:

- Head of Human Resources: Employment and use of agency staff.
- Health and Safety Manager: Estate contractors and sub-contractors
- Head of Finance Operations: Suppliers
- Group Legal & Compliance: Whistleblowing reports

Relevant policy, procedures and values

- **Best Practice Recruitment Guidelines –** we have a thorough recruitment process driven by HR to ensure that our recruitment practices meet and where possible exceed our legal responsibilities. We provide training to all employees involved in the recruitment process.
- **Temporary Staff -** we use an approved list of reputable employment agencies and verify the practices of any new agency added to that list. We currently use Adecco agencies for temporary staff; they have a zero-tolerance approach to modern slavery and human trafficking within their business and supply chains. They published their first statement in 2021 and since then have continued to increase their work in this area.

- **Employee code of conduct** – The Demant Code of Conduct is the framework that sets the minimum standards and ethical principles applicable to all employees regardless of location and nature of work. The Code of Conduct provides everyone with a common understanding of how we conduct business. We adhere to the laws of each country in which we operate and conduct business in line with the UN Global Compact principles and relevant internationally recognised standards. We adhere to quality regulations and conduct responsible marketing.
- **Employee Handbook** – The handbook makes clear the actions and behaviours expected of our employees at work and representing the company. We strive to maintain the highest standards of employee conduct, engagement and ethical behaviour across the business.
- The **Third Party Compliance Code** - this describes international standards and specific criteria which govern aspects of human and labour rights, including forced labour, child labour and young workers, freedom of association and non-discrimination, health and safety measures, environmental protection, privacy and ethics, as well as bribery and corruption. It also requires direct suppliers to adhere to social and environmental standards and contribute towards the protection of human rights. By complying with the TPCC, our direct suppliers are committing to ensuring that their own operations and supply chains address any modern slavery risks.

Monitor and Review

Training

All Hidden Hearing employees receive the following training:

Health and Safety

Demant Code of Conduct

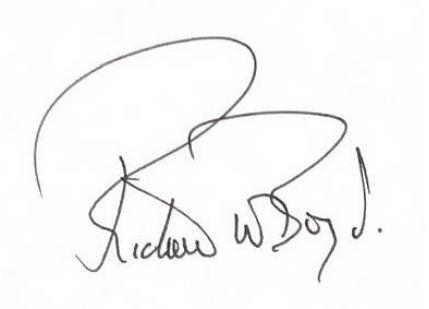
Measures of Success

All employees to have a sound understanding of the Code of Conduct and pass the training modules. The training will ensure that employees know how to raise issues and have the confidence to do so. Refresher training will be offered every 2 years.

Board approval

This statement was approved on by the organisation's board of directors, who will review and update it annually.

Director's signature:



Director's name: Richard Boyd, Managing Director

Date: June 2025