



Starkey

Legacy Built. Future Driven.

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Message from our Leadership

At Starkey, everything we do starts with the customer and the patient we ultimately serve. **For more than 50 years, our purpose has been clear: to use innovation, compassion, and craftsmanship to help people hear better and live better.**

Our commitment to innovation is rooted in listening—listening to patients, hearing care professionals, and our customers around the world. That focus shapes how we design and manufacture our products, how we support those who rely on them, and how we invest in solutions that are both meaningful and responsible. We believe innovation should improve lives, respect people, and stand the test of time.

Equally important is how we operate as a company. We strive to act with integrity, care for our employees and communities, and make thoughtful decisions that support long-term success for our customers, our people, and the communities we serve. This includes being mindful of our impact, strengthening trust through ethical business practices, and continuously improving how we work—across our operations, our partnerships, and our global footprint.

This report represents an important milestone for Starkey as our first comprehensive sustainability report. It reflects where we are today and marks the beginning of a more structured and transparent approach to how we communicate our impact and priorities. While this is an initial step, we are committed to building on this foundation over time. I am proud of the dedication our teams bring to Starkey every day and grateful to our customers, partners, and the patients who place their trust in us.



Brian Savalish

*President &
Chief Executive Officer*

2025 Sustainability Highlights

CONNECTING PEOPLE THROUGH
BETTER HEARING FOR NEARLY

60 YEARS

STARKEY IS AN
AMERICAN-OWNED
HEARING TECHNOLOGY
COMPANY

OVER **500**
PATENTS
GRANTED SUPPORTING
ADVANCED HEARING
TECHNOLOGIES

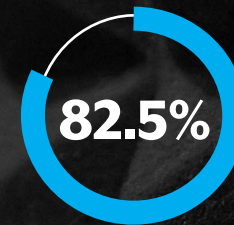
91% CUSTOMER
SATISFACTION SCORE

MORE THAN
5,000 EMPLOYEES
WORLDWIDE

369 ENGINEERS
& SCIENTISTS **ADVANCING**
HEARING HEALTH SOLUTIONS

UTILIZING **AI** TECHNOLOGY
TO MAKE STARKEY HEARING AIDS
MORE INTUITIVE, NATURAL, AND
PERSONALIZED FOR EACH USER

2025 CLIMATE MILESTONE
– FIRST YEAR OF SCOPE 1 & SCOPE 2
EMISSIONS MEASUREMENT



**EMPLOYEE
ENGAGEMENT
SCORE** IN OUR
ANNUAL SURVEY

COMMUNITY IMPACT:

- o Recognized as a **Beyond the Yellow Ribbon Company**, for efforts supporting the military community
- o More than **65,000 veterans or current military members** fitted with Starkey hearing aids during 2025
- o Named as inaugural partner of the **UNICEF Children with Disabilities Fund**
- o Official Partner and exclusive hearing aid sponsor of the **2026 Special Olympics USA Games**

Recognition & Awards



Fast Company

Next Big Things in Tech Award

Starkey was recognized in 2025 by Fast Company with a **Next Big Things in Tech Award** for our advancements in AI-powered hearing technology. This award highlights breakthrough innovations that are shaping the future of technology and improving real-world outcomes for users.



Inc. Magazine

Power Partner Award

Inc. recognized Starkey with its **2025 Power Partner Award**, honoring companies that provide exceptional products and services that help businesses succeed. This award reflects Starkey's commitment to innovation, quality, and strong partnerships with hearing care professionals worldwide.



International Business Awards

Gold Stevie Award (Edge AI)

Starkey received a **Gold Stevie Award** at the 2025 International Business Awards for our Edge AI hearing technology. This recognition highlights our leadership in applying artificial intelligence to enhance hearing performance, connectivity, and user experience.



Hearing Technology Innovators Awards

Edge AI Winner

Starkey's Edge AI platform was named a **2025 Hearing Technology Innovator Award winner**, recognizing excellence in advancing hearing technology. The award celebrates solutions that deliver meaningful improvements in hearing performance and patient outcomes.



Big Innovation Awards

Edge AI Winner

Starkey received a **2025 BIG Innovation Award** for our Edge AI technology, recognizing organizations that bring new ideas to life and deliver meaningful technological advancement. This award highlights Starkey's continued leadership in applying cutting-edge technology to hearing health solutions.



Business Intelligence Group

Artificial Intelligence Excellence Award

Starkey President and CEO Brandon Sawalich was named a winner of the prestigious **2025 Artificial Intelligence Excellence Award** by the Business Intelligence Group. This distinguished honor recognizes his leadership in driving AI innovation within the hearing industry and positions Starkey at the forefront of groundbreaking technology.



About this Report

Cautionary Statements

This report includes information about Starkey Laboratories, Inc. ("Starkey" or "the Company") and our subsidiaries and may include business and Environmental, Social, or Governance ("ESG") issues that have a direct and significant impact on our company, our employees, and our supply chain.

Statements regarding Starkey's objectives, plans, goals, targets, and commitments are aspirational. All data, statistics, and metrics presented in this report are estimates and have not been independently verified or audited by a third party. They are based on assumptions considered reasonable at the time of preparation, are subject to revision, and may evolve as methodologies and industry standards continue to develop. Annual data presented in this report covers our 2025 fiscal year (January 1 to December 31, 2025), unless otherwise stated.

This report uses terms such as "material" or "materiality" and references to these terms in this report are distinct from and should not be confused with the terms "material" and "materiality" as they are used in the context of financial statements and reporting required by applicable law and regulation. Any forward-looking information is as of December 31, 2025, and Starkey assumes no obligation to update or otherwise revise these forward-looking statements, whether resulting from new information, future events or otherwise.





¹ "Financial entities" refers to Starkey legal entities, subsidiaries, or reporting units included within the organizational boundary of the Company's GHG inventory.

Use of Estimates & Assumptions

Certain information contained in this report has been prepared using estimates and assumptions that involve management judgment. These estimates and assumptions are based on information available at the time of reporting and are considered reasonable under the circumstances. Actual results may differ as data collection processes, methodologies, and systems continue to evolve.

As Starkey's first comprehensive sustainability report, the disclosures presented herein establish an initial baseline for ESG reporting. Some metrics and qualitative disclosures are derived from early-stage data collection efforts and may be subject to refinement in future reporting periods as processes are further formalized and enhanced.

Greenhouse gas ("GHG") emissions data included in this report was prepared using a combination of actual activity data and estimation methodologies, depending on data availability across global operations. For certain financial entities¹, emissions were calculated using available utility consumption records and operational data, while other financial entities utilized cost- or spend-based estimation approaches where complete activity data was not yet centrally available. Emissions calculations incorporated applicable country- or region-specific emission factors, where available, to better reflect the geographic characteristics of energy consumption across Starkey's global operations. Emissions quantification methodologies were developed in alignment with the GHG Protocol Corporate Accounting and Reporting Standard. As Starkey continues to formalize global data collection processes and strengthen emissions tracking capabilities, methodologies and reported results may be refined in future reporting periods.

Reporting Scope

The disclosures presented cover Starkey's global operations and include data from company-owned facilities worldwide for the reporting period, unless otherwise noted. In cases where information pertains to a specific geography, business unit, or subset of operations, the scope is identified within the relevant section.



Reporting Framework Alignment

Starkey's inaugural Sustainability Report has been developed to support transparent, decision-useful disclosure while remaining proportionate to our current reporting maturity. The structure and content of this report are informed by widely recognized sustainability reporting frameworks and standards, with an emphasis on establishing a credible foundational baseline that can evolve over time.

IFRS S1

This report has been informed by the initial concepts outlined in the International Financial Reporting Standards ("IFRS") S1 Sustainability Disclosure Standard, including a focus on sustainability-related topics that may reasonably affect Starkey's long-term value, operational resilience, and stakeholder trust. In developing the report, Starkey considered the relevance of sustainability topics to our business model, governance, risk management practices, and operational activities. See further discussion related the selection of sustainability topics on [Page 10](#). Starkey expects alignment with IFRS S1 concepts to continue to mature as data, processes, and governance structures further develop.

While this report does not constitute full alignment with IFRS S1, the framework provides a useful reference point in shaping:

- The identification and prioritization of sustainability topics
- The integration of sustainability considerations with enterprise risk management
- The emphasis on consistency, transparency, and decision-useful disclosure

SASB Standards

Starkey has aligned this report with the Sustainability Accounting Standards Board (“SASB”) Medical Equipment & Supplies Standard, which provides industry-specific guidance on sustainability topics and metrics that are likely to be decision-useful to our stakeholders.

A Performance Metrics Table is included on [Page 52](#) to indicate where applicable SASB topics and metrics are addressed throughout this report and to provide transparency regarding the scope and nature of disclosures.

SASB was selected as the primary industry framework to:

- Anchor disclosures in issues most relevant to Starkey’s sector
- Support consistency and comparability over time
- Inform the selection of quantitative and qualitative metrics

Climate-related Reporting

Climate-related risks and opportunities are addressed in this Sustainability Report at a high level and within the context of broader risk management and operational resilience. More detailed climate-related financial risk disclosures, including considerations aligned with IFRS S2 (Climate-related Disclosures Standard) and the Task Force on Climate-related Financial Disclosures (“TCFD”) framework, are provided in Starkey’s separately issued [Climate-related Financial Risk Disclosures Report](#).

Ongoing Evolution of Reporting Practices

As this represents Starkey’s first comprehensive sustainability report, alignment with reporting frameworks will continue to mature over time. We anticipate refining methodologies, expanding data coverage, and enhancing governance processes in future reporting periods as sustainability reporting becomes increasingly integrated into business planning and decision-making.



Approach to Topic Selection

For Starkey's inaugural Sustainability Report, we implemented a structured process to identify the sustainability topics most relevant to our business, stakeholders, and long-term value creation. As a starting point, we referenced the SASB standards for the Medical Equipment & Supplies industry, which identify sustainability topics most likely to influence enterprise value within our sector.

To complement this framework and ensure broader consideration of emerging sustainability priorities, we also evaluated additional topics through a double materiality-informed lens. This approach considers both the potential financial implications of environmental and social issues on the business, as well as broader external drivers.

Topic identification was informed by several inputs, including:

- **Legal, regulatory, and policy drivers** relevant to Starkey's operations and markets
- **Industry norms and best practices** within the global hearing healthcare and medical technology sector
- **Customer and consumer expectations**, including topics increasingly raised through procurement processes and third-party assessments
- **Opportunities for innovation**, particularly where sustainability considerations intersect with product design, patient outcomes, and technology development
- **Potential financial impacts** that sustainability-related issues may have on operations, strategy, or long-term business resilience

Starkey's Sustainability Pillars

To provide a clear structure for this report, we organized our priority topics into four sustainability pillars that reflect key areas where our operations, products, and governance practices intersect with environmental, social, and business performance.

These pillars reflect the priority sustainability topics identified through our double materiality-informed topic selection process, which considered regulatory drivers, stakeholder expectations, and potential impacts on our operations and long-term resilience.

Sustainability Pillar

Related Report Sections

Pillar 1

CARING FOR PEOPLE

Supporting people through a safe, inclusive, and engaging workplace, expanding access to hearing care and life-enhancing solutions, and investing in communities through philanthropy, partnerships, and volunteer efforts.

- Employee Engagement & Company Culture
- Workforce Health & Safety
- Patient Outcomes & Accessibility
- Community Involvement & Philanthropy

Pillar 2

RESPONSIBLE HEARING SOLUTIONS

Delivering innovative hearing solutions that meet rigorous safety, quality, and regulatory standards, promoting ethical marketing and claim integrity, and advancing responsible product stewardship across the lifecycle.

- Innovation & Product Leadership
- Product Safety & Quality
- Ethical Marketing & Claim Integrity
- Product Lifecycle & Circularity
- Affordability & Market Access

Pillar 3

OPERATIONAL STEWARDSHIP

Managing environmental impacts through efficient operations, including efforts to measure greenhouse gas emissions, optimize energy and resource use, and minimize waste through recovery, recycling, and continuous improvement practices.

- Climate & Environmental Impact
- Approach to Waste Across Operations
- Product Packaging

Pillar 4

BUSINESS INTEGRITY & RESILIENCE

Advancing ethical business conduct, responsible sourcing, and supplier accountability across the value chain while strengthening resilience through integrated risk management, attention to climate-related and regulatory developments, and protection of sensitive information and digital systems.

- Corporate Governance & Board Oversight
- Ethics & Accountability
- Enterprise Risk Management
- Data Privacy & Cybersecurity
- Responsible Sourcing Practices

About Starkey

Starkey is a **global hearing technology company** dedicated to designing and delivering advanced hearing solutions that help people connect more fully with the world around them. Founded in 1967 and headquartered in Eden Prairie, Minnesota, Starkey develops innovative hearing technologies that support communication, engagement, and overall well-being.



371 retail clinic
locations

29 sites and
manufacturing facilities



Starkey's portfolio includes hearing aids and related technologies designed to enhance sound quality, connectivity, and user experience. We serve patients through a global network of hearing care professionals and distribution partners, delivering hearing solutions to individuals in communities around the world.

Innovation is central to Starkey's approach to hearing care. We continue to invest in research and development to advance hearing technologies that integrate artificial intelligence, health and wellness features, and connectivity with digital devices. These innovations are designed to support more personalized hearing experiences while helping individuals stay active and engaged in their daily lives.

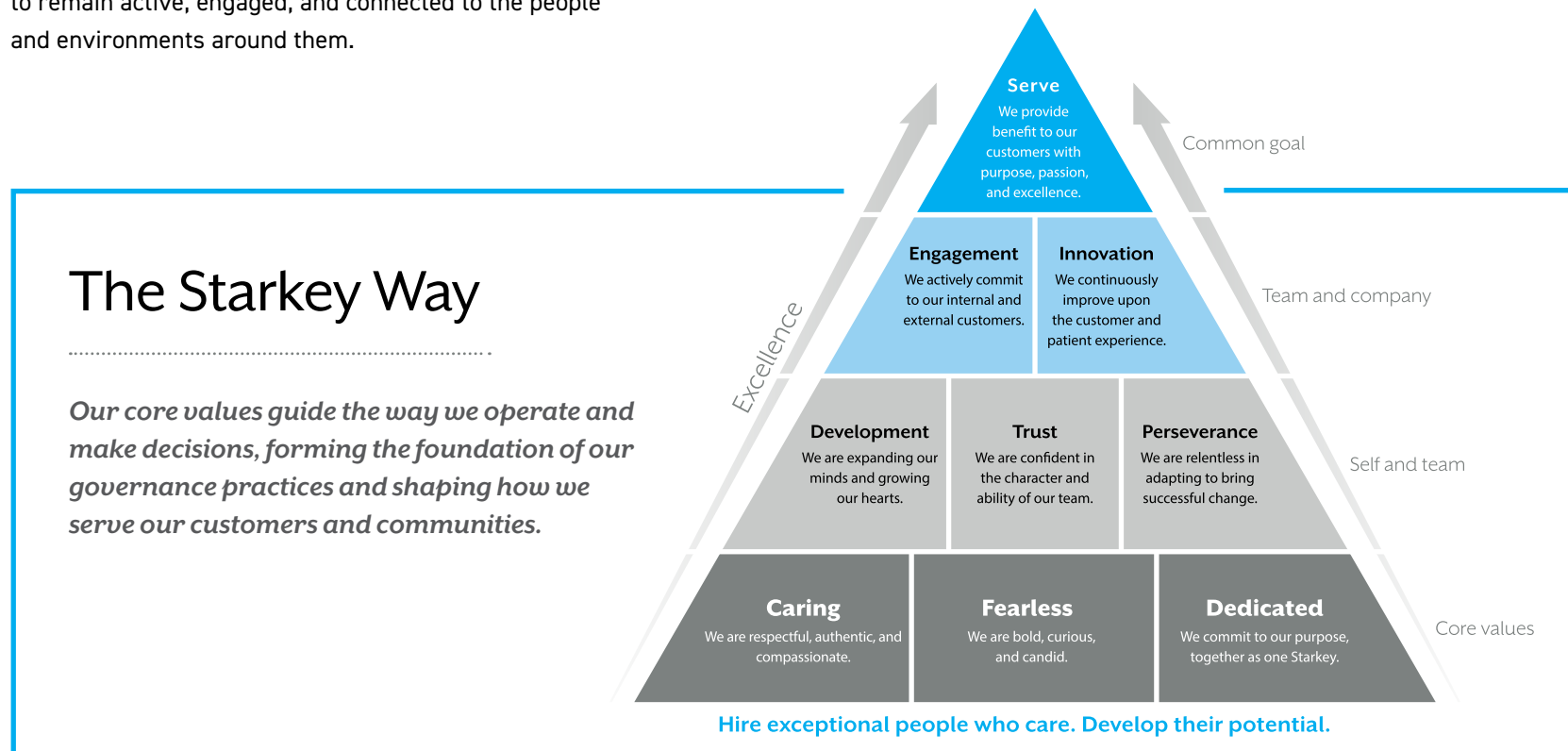
With a focus on technological advancement and patient-centered care, Starkey strives to improve hearing outcomes while contributing to broader health and wellness. Through our global operations, partnerships, and ongoing innovation, we play an important role in addressing the growing demand for hearing care worldwide.

Our Purpose & Commitment

Mission, Values & Patient-first Philosophy

At Starkey, our purpose is rooted in helping people hear better so they can live better. Starkey's mission is centered on improving hearing health and quality of life through innovative hearing technologies and patient-focused care. This commitment reflects a belief that better hearing supports stronger connections, greater independence, and overall well-being.

Starkey's approach to hearing care is guided by a patient-first philosophy, placing the needs and experiences of individuals at the center of product design, service delivery, and innovation. Grounded in our core belief that "Hearing is Our Concern," we combine advanced technology with a deep understanding of patient needs to deliver solutions that empower individuals to remain active, engaged, and connected to the people and environments around them.





Our culture and decision-making are shaped by three core values:

Caring, Fearless, and Dedicated

These values guide how Starkey serves patients, collaborates with partners, and supports our global workforce.



Caring reflects Starkey's commitment to valuing and respecting every individual and the unique experiences they bring. We prioritize building authentic relationships grounded in honesty, trust, and active listening. This mindset reinforces our purpose of helping people hear better and live better.

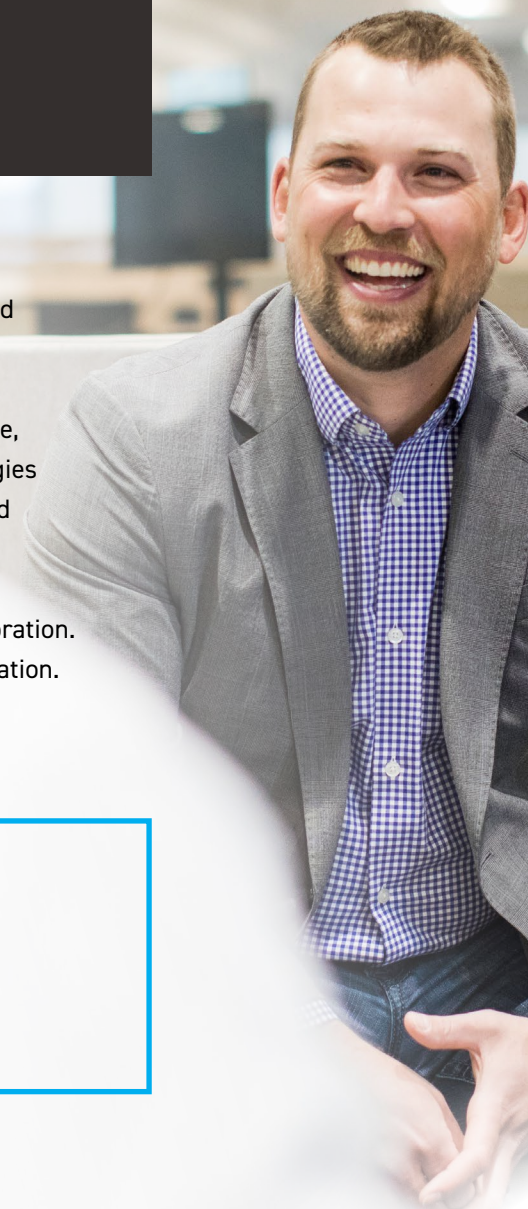


Fearless reflects a culture of curiosity, ingenuity, and bold innovation. We encourage open dialogue, candid communication, and the pursuit of new ideas that can strengthen the impact of our technologies and services. By continuously seeking opportunities to improve, we aim to advance hearing care and expand access to meaningful solutions.



Dedicated reflects our unwavering commitment to our mission and the collective power of collaboration. We value strong relationships and recognize that diverse perspectives and experiences drive innovation. Through teamwork and shared purpose, we strive to deliver meaningful advancements in hearing technology and patient care.

Together, these values support Starkey's mission and reinforce our commitment to **improving hearing health and quality of life for individuals around the world.**





Improving Lives Through Better Hearing

Hearing health plays a critical role in overall well-being, communication, and quality of life. Hearing loss is one of the most prevalent health conditions globally, affecting hundreds of millions of people and often going untreated due to barriers such as awareness, access to care, and affordability. Left unaddressed, hearing loss can contribute to social isolation, reduced workplace participation, and broader health challenges. Expanding access to hearing care is therefore an important component of supporting healthier and more connected communities.

As a global hearing technology company, Starkey is committed to improving access to hearing health by combining advanced technology with a patient-centered approach to care. Through the design and delivery of innovative hearing solutions, we seek to empower individuals to remain engaged with the people and environments around them. Our hearing technologies are designed not only to enhance hearing but also to support broader aspects of health and wellness, reflecting the growing understanding of the connection between hearing health and overall well-being.

Innovation plays a central role in Starkey's efforts to expand access to hearing care. We continue to invest in research and development to advance hearing technologies that deliver improved sound processing, connectivity, and user experience. Features such as artificial intelligence-enabled sound processing, integrated health and wellness tracking, and digital hearing care capabilities help deliver more personalized and responsive hearing solutions for our customers.

Starkey also supports initiatives that expand access to hearing care in communities where treatment options may be limited. Through partnerships and philanthropic efforts, we contribute to programs that raise awareness of hearing health and provide hearing solutions to individuals in need.

By advancing hearing technology and promoting broader access to hearing care, Starkey aims to improve quality of life for individuals experiencing hearing loss while helping people stay connected to the world around them.



Pillar 1: Caring for People



Starkey's mission is to help people hear better and live better. That mission begins inside the company before it reaches any patient. This pillar describes how we support our employees through a safe, inclusive, and engaging workplace, improve patient outcomes and access to hearing care, and invest in the communities around us through philanthropy, partnerships, and volunteerism.



Employee Engagement & Company Culture

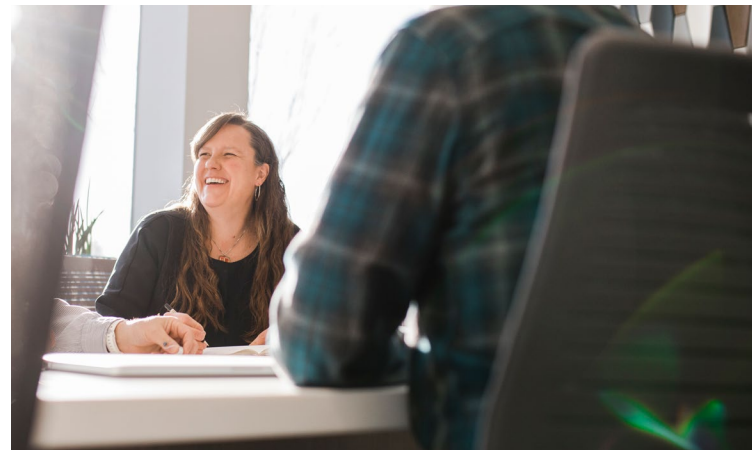
At Starkey, fostering a positive and inclusive workplace culture is essential to delivering on our mission to help people hear better and live better. Starkey's employee engagement approach is grounded in our core values – **Caring, Fearless, and Dedicated** – which emphasize respect for individuals, open communication, collaboration, and a shared commitment to innovation and purpose.

Starkey supports employee development through a combination of global and local learning opportunities. Employees worldwide have access to professional development resources which offer training programs across a range of technical, professional, and leadership topics. In addition, Starkey maintains a **Global Compliance Training Program** that includes required ethics and business conduct training, with completion tracked across the organization.

Starkey's commitment to a respectful, inclusive, and responsible workplace is further supported by our labor and human rights expectations, which reinforce principles related to fair treatment, workplace dignity, non-discrimination, and compliance with applicable labor standards across our operations. These expectations align with our broader values and help support a workplace culture grounded in respect, accountability, and integrity.

Starkey is committed to supporting employee well-being through accessible, on-site health resources at our two largest locations—Eden Prairie and Matamoros. Employees at these sites have access to dedicated medical support, including on-site doctors, nurses, and therapy services, helping to address both routine and immediate health needs. At the Eden Prairie location, Starkey extends this support to employees' families by offering services such as acute care, physical therapy, annual physicals, and sports physicals for children, reinforcing a culture that prioritizes the health and well-being of our workforce and broader community.

In 2026, Starkey plans to expand our leadership development initiatives through the launch of **Leader Foundations 1.0**, a global leadership program designed to strengthen management capabilities and support the development of leaders across our organization.



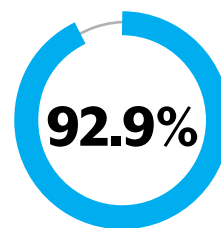


Beyond formal training programs, Starkey encourages employee engagement through community involvement and collaboration. U.S.-based employees receive **one paid volunteer day each year**, enabling them to support organizations and causes that matter to them. Employees participate in a variety of community initiatives, including support for organizations focused on health, disability inclusion, and community well-being. In the United States, Starkey also provides 12 weeks of fully paid parental leave, helping employees balance the demands of a growing family without financial pressure. Globally, parental leave is provided in line with applicable local regulations and practices.

While many training and engagement activities occur at the local or regional level, Starkey continues to evaluate opportunities to strengthen global visibility and coordination of employee development programs as part of our ongoing commitment to supporting our global workforce.

Starkey conducts an **annual employee engagement survey** to gather feedback from employees across the organization. The survey provides insights into employee satisfaction, workplace culture, leadership, and opportunities for improvement. Leadership reviews survey results to better understand employee perspectives and inform initiatives that support a positive and engaging workplace.

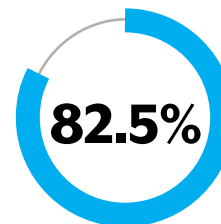
2025 SURVEY HIGHLIGHTS:



**PARTICIPATION
RATE**

84.6%

**EMPLOYEES FEEL
CONNECTED TO
STARKEY'S MISSION**



**OVERALL
ENGAGEMENT
SCORE**

87.1%

**EMPLOYEES AGREED
WITH THE STATEMENT:
"I AM PROUD TO WORK
FOR THIS COMPANY."**



A Workplace and Community We're Proud of

Starkey's commitment to people, both within our organization and in the communities we serve, is reflected in recognition across our global operations. These honors highlight our focus on workplace culture, employee experience, and meaningful community engagement.

UNITED STATES

Star Tribune Top Workplaces



Starkey was named a 2025 Star Tribune Top Workplaces winner, reflecting our strong employee engagement and a workplace culture built on purpose, innovation, and collaboration. This award is based on employee feedback evaluating leadership, values, and workplace environment.

CHINA



Best Employer in Greater Suzhou (2023–2025)

Starkey China has been recognized as a Best Employer in Greater Suzhou for three consecutive years, highlighting a consistent commitment to employee experience, workplace culture, and organizational excellence in the region.

INDIA

Great Place to Work



Starkey India earned Great Place to Work® Certification, recognizing a high-trust, high-performance culture built on employee feedback and a strong foundation of credibility, respect, and pride in the workplace.

AUSTRALIA



Community Recognition – Women & Children First (2025)

Starkey Australia received an appreciation note in 2025 recognizing our support and donations to Women & Children First, reflecting a commitment to supporting vulnerable communities and making a meaningful local impact.



Workforce Health & Safety

Protecting the health and safety of employees is a fundamental responsibility at Starkey. We strive to maintain safe and compliant workplaces across our global operations and work to ensure employees have the resources and processes needed to perform their roles safely.

Health and safety practices are primarily managed at the facility level, particularly within manufacturing and operational locations. Local teams are responsible for implementing safety procedures, maintaining compliance with applicable regulatory requirements, and addressing site-specific workplace risks. Facilities monitor safety performance and maintain procedures designed to support safe working conditions.

Because Starkey's operations are largely focused on medical technology design, manufacturing, and distribution rather than heavy industrial activities, workplace safety risks are generally limited. Nevertheless, Starkey remains committed to maintaining safe work environments and ensuring that employees and contractors follow established safety practices.

As we continue to strengthen our sustainability and reporting processes, Starkey is evaluating opportunities to further enhance visibility into global safety practices and metrics across facilities.



In the global annual engagement survey, **89% of employees said they have the resources needed to perform their job safely.**



Patient Outcomes & Accessibility

At Starkey, improving patient outcomes and expanding access to hearing care are central to our mission of helping people hear better and live better. Hearing loss can significantly affect communication, independence, and overall quality of life, making early intervention and effective hearing solutions essential for individuals to remain active and connected in their daily lives.

We design our hearing technologies with a patient-centered approach that prioritizes sound quality, comfort, connectivity, and ease of use. By combining advanced hearing technology with digital tools and connectivity features, we aim to deliver solutions that enhance the hearing experience while supporting broader health and wellness outcomes.

Listening to Patients & Hearing Care Professionals

Starkey maintains a structured global feedback system to better understand patient experiences and continuously improve products and services. We regularly gather feedback from hearing care professionals and customers through a variety of survey mechanisms, including:

- ✓ **Annual customer satisfaction surveys** distributed across our global customer base
- ✓ **Quarterly customer service surveys** focused on service interactions
- ✓ **Market-specific surveys** conducted across key global markets

Starkey conducted over 20 customer feedback surveys globally during 2025, providing insights into product performance, service quality, and overall customer experience. Feedback collected through these surveys evaluates multiple dimensions of the hearing care journey, including product performance, ease of use, sound quality, service interactions, communication with sales representatives, and digital experience through mobile applications and connectivity features.

Customer Satisfaction Results:

- 91%** Customer Satisfaction
- 55%** *classified as "excellent"* Net Promoter Score
- 89%** Product Satisfaction
- 82%** Customer Journey Satisfaction

These results represent improvements compared to previous survey cycles and reflect our continued focus on delivering reliable, high-quality hearing solutions.



Continuous Improvement Through Patient Feedback

Customer insights play an important role in Starkey's product development process. Survey results are shared with executive leadership, incorporated into product management, and delivered to innovation teams to inform product design and service improvements.

Examples of improvements driven by customer feedback include enhancements to hearing aid features, updates to custom shell materials to improve durability, improvements to connectivity solutions, and expanded digital documentation to simplify user instructions. Our structured feedback loop enables Starkey to continuously refine our products and services while responding directly to the needs of patients and hearing care professionals.



“Due to an injury while serving in Vietnam, I have been wearing hearing aids for years. Starkey is the first hearing aid that I look forward to wearing when I get up in the morning.”



Expanding Access to Hearing Care

Starkey works to expand access to hearing care through programs that support individuals who may otherwise face barriers to treatment. One example includes our work supporting hearing solutions for military veterans, helping eligible veterans access hearing technology through the U.S. Department of Veterans Affairs.

Programs like these help ensure that individuals who have served their country can benefit from advanced hearing technologies designed to support communication, independence, and overall quality of life.

Through ongoing innovation, patient engagement, and initiatives that expand access to care, Starkey strives to improve hearing outcomes and empower individuals to remain connected to the people and environments around them.

Hearing Help for Veterans



As an American-owned hearing technology company, Starkey is proud to help those who serve our country by fitting over 65,000 veterans in 2025. Approximately 2.7 million veterans are affected by hearing loss or tinnitus, making them 30% more likely than non-veterans to experience these conditions and underscoring the importance of access to quality hearing care and support.





Community Involvement & Philanthropy

Expanding access to hearing healthcare remains a core element of Starkey's social impact. Through our **Starkey Cares** initiative and related philanthropic efforts, Starkey supports programs that help individuals access hearing care and hearing technology when financial, geographic, or other barriers may exist. These efforts reflect our broader mission to help people hear better so they can live better.



Special Olympics Healthy Hearing

Starkey partners with **Special Olympics** to support hearing health initiatives that provide hearing screenings and hearing care services for athletes with intellectual disabilities. As part of this collaboration, Starkey was named the **exclusive hearing aid sponsor and an official partner of the 2026 Special Olympics USA Games**, supporting efforts to promote inclusive health and improve access to hearing care for athletes. Read more [here](#).

The logo for Hear Now, featuring the word "Hear" in white on a blue square background, followed by the word "Now" in a grey sans-serif font.

Hear Now Program

In the United States, Starkey supports the **Hear Now** program, which helps provide devices to individuals with limited financial resources. By working with hearing care professionals across the country, the program helps ensure that individuals who might otherwise be unable to afford hearing technology can access the hearing care they need.



UNICEF Children with Disabilities Fund



Starkey is an inaugural supporter of UNICEF Children with Disabilities Fund, which works to improve access to services and opportunities for children living with disabilities. The initiative supports programs that strengthen healthcare systems, expand access to assistive technologies, and promote inclusion for children worldwide.

Beyond national and global initiatives, Starkey's philanthropic engagement also extends to local community efforts led by employees and regional teams. Under the **Starkey Cares** umbrella, teams across the organization support nonprofit initiatives aligned with community impact, veterans and military support, and outreach programs that promote health and well-being.

While many of these initiatives are locally driven and tailored to regional community needs, they reflect a consistent commitment across Starkey's global operations to contribute positively to the communities where employees live and work. Through Starkey Cares and its broader philanthropic partnerships, we seek to expand access to hearing care while supporting initiatives that strengthen communities and improve quality of life.

673 patients served through the HearNow program in 2025



Pillar 2: Responsible Hearing Solutions



At Starkey, we define ourselves as a technology company that cares. Every product decision, quality standard, and market access initiative reflects a belief that advancing hearing technology and acting responsibly are not competing priorities, but part of the same mission. This pillar describes how that commitment is expressed through the innovative products we bring to market, the standards we hold ourselves to, and our focus on ethical marketing, product stewardship and access to hearing solutions.



Innovation & Product Leadership

Starkey's approach to innovation is grounded in a clear belief: better technology, when designed with patients at the center, produces better lives. Our research and development teams work continuously to advance hearing solutions that are not only clinically effective, but intuitive, comfortable, and connected to the broader digital environments in which patients live.

Innovation at Starkey is not driven by technology alone. A structured feedback loop², among sales teams, hearing care professionals, and product management helps ensure that development priorities reflect what patients and clinicians actually need. Customer insights, including requests for longer battery life, smaller form factors, and improved rechargeability, directly inform the product roadmap and help keep innovation grounded in real-world experience.

Our latest platform, Omega AI, represents the most significant expression of that philosophy. As an AI-powered hearing solution, it is designed to learn from real-world sound and deliver more natural, clearer hearing across a wide range of listening environments. In 2025, Starkey's Edge AI platform received the BIG Innovation Award, recognizing our continued track record of bringing meaningful technological advancement to market.

OMEGA^{AI} at a Glance

- **Deep neural network technology trained on millions of real-world audio samples**
- **Available in behind-the-ear, receiver-in-canal, and custom in-ear configurations**
- **Incorporates Auracast™ and Google Fast Pair connectivity**
- **Clinical research supports 28% improvement in speech recognition vs. previous generation**



² Refer to Patient Outcomes & Accessibility on [Page 22](#) for additional information on how customer feedback is gathered.



Product Safety & Quality

As a medical device manufacturer, Starkey operates in a highly regulated global environment. Our approach to product safety and quality is not simply a compliance exercise. It reflects our responsibility to the patients and hearing care professionals who rely on our devices every day.

All Starkey products are developed, manufactured, and serviced under a globally certified ISO 13485:2016 Quality Management System ("QMS"), which provides the structural foundation for product quality across the device lifecycle. Our QMS aligns with key regulatory frameworks, including U.S. FDA requirements, the EU Medical Device Regulation ("MDR"), Health Canada standards, and other applicable global regulations.

Product safety and performance are evaluated through rigorous pre-market testing, including durability, functionality, and reliability assessments. After products are launched, post-market surveillance, complaint management, and corrective action processes help ensure that any issues identified after commercialization are addressed systematically.

Environmental and human health considerations are integrated into our development and compliance processes. We assess material compliance and conduct biocompatibility evaluations to help ensure that components in direct contact with patients meet applicable safety standards. Starkey also complies with the Restriction of Hazardous Substances ("RoHS") Directive and the Registration, Evaluation, Authorization, and Restriction of Chemicals ("REACH") regulation, integrating these requirements into supplier qualification and quality controls.





Product Quality and Compliance

- ✓ ISO 13485:2016 certified Quality Management System, successfully maintained through every recertification cycle in company history
- ✓ Compliance with FDA, EU MDR, Health Canada, and applicable global standards
- ✓ Biocompatibility assessments and RoHS/REACH compliance embedded in development processes
- ✓ 100% of products compliant with applicable regulatory standards at market launch
- ✓ No product recalls, no FDA warning letters, and no safety or environmental incidents

Executive leadership maintains formal oversight of the QMS through structured management review processes that support ongoing effectiveness and continuous improvement. Starkey has maintained ISO 13485 certification through every recertification cycle in company history, with full recertification audits conducted every three years and surveillance audits carried out annually in the intervening years. The most recent recertification audit of our Eden Prairie headquarters took place in June 2025.

As new regulatory requirements emerge across global markets, Starkey implements structured quality plans to ensure alignment across documentation, manufacturing processes, and regulatory notifications. Because compliance programs are implemented globally through headquarters, requirements adopted in one market are often applied more broadly across facilities, allowing Starkey in some cases to exceed the minimum obligations in markets where those requirements do not yet apply.

This disciplined approach is reflected in Starkey's performance record. Since becoming a Class II medical device manufacturer in 2012, Starkey has had no product recalls, no FDA warning letters, and no reported safety or environmental incidents across our facilities.



Ethical Marketing & Claim Integrity

Hearing care professionals and patients trust that the claims Starkey makes about our products are accurate, evidence-based, and compliant with applicable requirements. Maintaining that trust requires a disciplined, cross-functional process that governs how claims are developed, validated, and approved before they reach the market.

At Starkey, this process begins early in product development. Our strategic insights team works alongside research and development to identify potential product claims as product features evolve and supporting clinical data emerges. Those claims are then tracked through the remainder of the development process to help ensure that the supporting evidence remains valid as the product advances toward launch.

Formal claim approval is led by product management and includes review by a cross-functional team that may include regulatory affairs, clinical research, legal counsel, and marketing. Approved claims are documented in certified project records within our product management system, linking each claim to its supporting evidence and confirming that required stakeholders have reviewed and approved it.

Instructions for use ("IFUs"), the documentation that accompanies every hearing device, follow a separate but equally rigorous review process. These materials are reviewed by product management, marketing, regulatory affairs, and systems engineering, and are validated through usability testing with patients before finalization. IFUs are also adapted across multiple languages and regional variants, with country-specific regulatory information included where required.

Starkey's approach to marketing integrity is further informed by guidance from the Hearing Industries Association ("HIA"), which provides industry-wide standards for responsible claims and ethical promotion. Together, external guidance and internal review processes help support a consistent and responsible approach to product communications.

Claims Integrity at a Glance

- Cross-functional claim review involving R&D, regulatory, legal, and marketing
- All claims documented and certified prior to market launch
- IFUs validated with patients and reviewed by regulatory affairs
- Marketing practices aligned with HIA guidance



Product Lifecycle & Circularity

Starkey considers product stewardship across the lifecycle, from design and manufacturing through repair, recovery, and end-of-life management. Our approach focuses on extending product life where possible, reducing material use where feasible, and supporting responsible handling when products reach the end of their usable life.

One of the clearest examples of this lifecycle focus is the continued shift in our product portfolio from disposable zinc-air batteries to rechargeable solutions. This transition reduces reliance on single-use consumables, supports longer product lifecycles through integrated charging systems, and responds to both patient preferences and environmental considerations.

Products are brought to market through a globally standardized New Product Introduction framework, a phase-gate process with defined approval checkpoints covering strategic alignment, technical feasibility, regulatory readiness, and manufacturing validation. Executive leadership participates in key gate approvals, reinforcing accountability throughout development. Post-launch reviews then assess performance against predefined commitments and help ensure that early quality signals are addressed promptly.

Durability and repairability are considered early in the design process. Engineering teams review warranty data, serviceability trends, and repair rates to help reduce failures and extend product life. Where products are returned, Starkey maintains reverse logistics processes that prioritize repair or refurbishment before recycling or disposal. Devices that cannot be reused are processed through certified recycling channels in accordance with applicable electronic waste and medical device requirements.

Starkey also complies with applicable take-back and extended producer responsibility requirements across relevant jurisdictions, including the Waste Electrical and Electronic Equipment Directive in the UK and EU and the EU Batteries Regulation (EU 2023/1542). Country-specific take-back and disposal information is incorporated into regional product documentation where required. As the regulatory landscape continues to evolve, particularly in the EU, we continue to evaluate emerging obligations and work to integrate applicable practices across operations.

All Make Repair Program

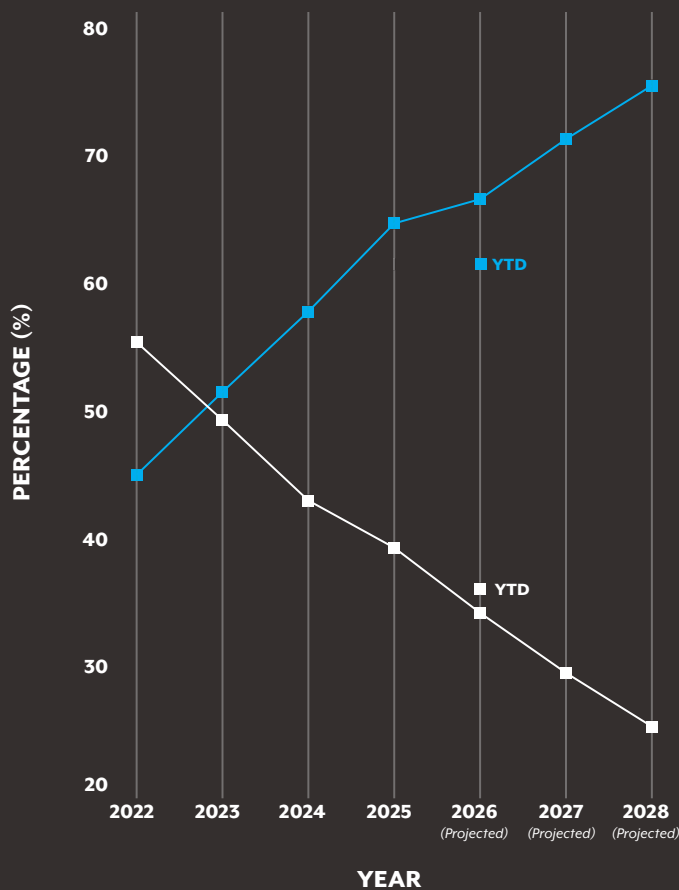
At both our headquarters location in Eden Prairie, as well as our UK locations, Starkey's All Make Repair program services hearing aids from all manufacturers—helping extend product life and keep devices in use and out of landfills. By refurbishing and repairing a wide range of devices, and salvaging components from recycled hearing aids when possible, the program supports both patient access and a more circular approach to product lifecycle management.



Transition Toward Rechargeable Solutions

Starkey continues to expand our portfolio of rechargeable hearing aids, reflecting evolving patient preferences and a shift toward longer-lasting power solutions. Rechargeable devices reduce reliance on disposable zinc-air batteries and support extended product lifecycles through integrated charging systems.

Over the past several years, rechargeable adoption has steadily increased:



Rechargeable devices are projected to represent approximately 75% of the portfolio by 2028. As that share grows, the volume of disposable batteries associated with Starkey products is expected to continue to decline, making this transition one of our clearest and most trackable contributions to product sustainability.



Affordability & Market Access

Hearing loss is one of the most prevalent and undertreated health conditions in the world. One of Starkey's most important responsibilities, and one of our most deliberate commercial choices, is helping ensure that the people who need our products can access them.

Starkey's product portfolio is structured across multiple technology tiers, reflecting our commitment to serving patients across a wide range of financial circumstances. From entry-level devices that provide reliable hearing support to advanced AI-powered platforms, this tiered approach allows hearing care professionals to match patients with solutions that fit both their hearing needs and their budgets.

In the U.S., Starkey also works within government-funded healthcare programs to help extend access to patients who might otherwise face barriers to hearing care. We price products to support participation in Medi-Cal and other state Medicaid programs, helping hearing care professionals offer Starkey devices at reimbursable rates for lower-income patients. As an American-owned hearing technology company, Starkey also maintains a strong commitment to supporting veterans through the U.S. Department of Veterans Affairs, helping eligible veterans access advanced hearing technology through their earned benefits.

Pricing structures vary across markets and customer types, reflecting differences in global healthcare systems and distribution channels. Our approach is guided by a consistent principle: making hearing technology accessible to as many people as possible across the markets we serve.

For programs that go further, providing hearing aids at no cost to individuals who face financial, geographic, or other barriers to care, please see our *Community Involvement & Philanthropy* initiatives described on [Page 25](#).



Through responsible innovation, rigorous quality standards, and thoughtful decisions about how our products reach patients, Starkey works every day to be exactly what we set out to be: **a technology company that cares.**



Expanding Access Through National Reimbursement Systems

In European markets, national reimbursement frameworks ensure that hearing care is financially accessible to all insured patients.



In Germany, Starkey registers eligible devices in the statutory Medical Aids Directory (Hilfsmittelverzeichnis), enabling patients to receive hearing technology at no personal cost.



In France, devices benefit from government subsidies under the LPPR framework, with Class I fully covered and Class II partially reimbursed.

By participating in both systems, Starkey helps patients access hearing care regardless of their financial means.



Pillar 3: Operational Stewardship

Starkey's operational footprint spans manufacturing facilities, distribution centers, and commercial offices across the Americas, Asia, and Europe. Managing that footprint responsibly, from the energy we consume and the emissions we generate to the waste we produce and the materials we use, is a core part of operating with integrity. This pillar describes where we are today, what we have begun to measure, and how we are working to strengthen environmental stewardship across our operations over time.





Climate & Environmental Impact

Establishing our greenhouse gas emissions baseline represents an important step in Starkey's sustainability journey. This is the first year we have systematically measured and reported our GHG emissions, providing a stronger foundation for a more informed, data-driven approach to managing our environmental footprint over time.

To support this effort, Starkey developed a GHG Inventory Management Plan that identifies key data sources, defines the methodologies for consistent emissions tracking, and establishes internal processes to support data quality over time. Using this framework, we calculated our Scope 1 and Scope 2 emissions in accordance with the GHG Protocol Corporate Standard. Given Starkey's organizational structure, which includes multiple global entities and subsidiaries operating across diverse systems and geographies, estimation techniques were utilized in certain areas to support consistent emissions quantification where centralized activity data was not yet fully available.³

During 2025, we initiated several key actions to assist us in developing a baseline of our GHG emissions, including:

- ✓ Development of a GHG Inventory Management Plan to identify data sources, define methodologies, and establish processes for consistent emissions tracking
- ✓ Calculated a baseline of our Scope 1 and Scope 2 emissions in accordance with the GHG Protocol Corporate Standard
- ✓ Defined key performance indicators for ongoing monitoring and future disclosure

³ Please refer to [Page 7](#) for additional information regarding greenhouse gas emissions calculation methodologies, assumptions, estimation approaches, and applied emission factors used in preparing reported emissions data.





Scope 1 emissions are generated directly from Starkey's operations and generally include fuel combustion at company facilities, stationary equipment, and company-owned vehicles, as well as other direct emissions sources under Starkey's operational control. Scope 2 emissions result from the purchased electricity and energy used to support our operations. As a medical technology company focused on precision manufacturing rather than heavy industrial processes, our direct emissions footprint is relatively limited compared to more energy-intensive sectors. Nevertheless, establishing a credible baseline is an important first step toward identifying reduction opportunities and supporting future target-setting.

In addition to this report, Starkey published our first [Climate-related Disclosures report](#) in 2025 in alignment with California's SB 261 requirements, providing further transparency into how we evaluate and manage climate-related risks and opportunities. Climate risk management is integrated into our broader enterprise risk management approach, as described on [Page 44](#).

As we continue to develop our emissions measurement capabilities and refine our data collection processes, we intend to strengthen our climate reporting over time. This includes assessing the feasibility of establishing emissions reduction targets and, in future reporting periods, expanding our measurement to address Scope 3 emissions from our supply chain and the use of our products.

2025 GHG Emissions

Scope 1	1,452 Metric tons CO ₂ e
Scope 2	6,000 Metric tons CO ₂ e

Water Use & Risk Awareness

Water use is not a significant operational input for Starkey. However, we monitor water consumption at owned facilities through utility management practices and consider potential exposure to water-stressed regions as part of our broader environmental risk awareness. Given the nature of our operations, water-related impacts are considered limited.





Approach to Waste Across Operations

Starkey manages operational waste through facility-level practices, certified third-party disposal vendors for electronic waste and batteries, and a centralized returns process at our Matamoros, Mexico facility where returned devices are assessed for repair, component recovery, or responsible recycling. **All returned products are routed to this single location before any final disposition, ensuring consistent handling across our operations.**

2025 represents our first year of establishing a more structured baseline for waste data. We are currently working to improve traceability and consistency across our waste streams, with operational improvement initiatives underway in 2026 to close gaps in tracking from intake through to final disposition. As this work matures, we expect to report granular waste metrics in future periods.

Across our global manufacturing network, Starkey processed approximately 25 metric tons of electronic waste through our certified recycling partner, consolidating waste at our Eden Prairie headquarters before final disposition. All electronic waste was channeled through certified recycling, with certain materials generating recovery credits that reflect meaningful material value recapture rather than simple disposal. Batteries were managed through separate certified handling streams in accordance with applicable regulations.

Starkey processed over 1.6 million devices through our global recovery program, reflecting both the scale of our customer base and our commitment to extending product life. Each device is evaluated at the Matamoros facility for repair, component recovery, or responsible recycling, with a strong focus on reuse before any final disposition.

Approximately
25 metric tons
of electronic waste
recycled globally

630 pounds of
batteries
managed through
certified disposal
(hazardous waste)

100%
of electronic waste
processed through
certified recycling
channels



Product Packaging

Product Packaging is an emerging focus area for Starkey as we work to build a more structured approach to packaging sustainability. At the end of 2024, packaging components were added to customer orders in our ERP system for the first time, creating an initial baseline for tracking consumption and supporting more informed decision-making over time.

Starkey's product packaging is 100% recyclable, using cardboard and PET plastic: materials that meet applicable recyclability standards while supporting the durability and protection our devices require during shipping. In parallel, Starkey has begun requiring suppliers to use PET⁴ plastic in certain applications in response to regulatory requirements, and standard recycling labeling is included on product packaging where applicable.

Building on this foundation, Starkey is exploring further steps to reduce packaging material intensity. In 2026, we began evaluating right-sized shipping solutions at our distribution center, designed to ensure products are shipped in the smallest appropriate overpack box. While driven primarily by operational efficiency, reduced material use and lower transportation impact are direct benefits. As our approach to packaging matures, we are also evaluating how evolving regulatory expectations, including EU requirements related to recyclable packaging content, may be incorporated into our strategy. Packaging sustainability is expected to remain a focus area for future advancement.

Packaging: Current Progress



- ✓ Packaging components added to ERP tracking at end of 2024
- ✓ PET plastic required in certain applications
- ✓ Product packaging is 100% recyclable
- ✓ Recycling labeling applied where applicable

Operational stewardship at Starkey is a journey that is well underway but not yet complete. The steps we took in 2025, measuring our emissions for the first time, centralizing and improving our recovery processes, and building the data infrastructure to track packaging consumption, are the building blocks of a more mature environmental program. **We are committed to reporting honestly on our progress and to strengthening our performance year over year.**

⁴ PET (polyethylene terephthalate) is a commonly used plastic in packaging that is valued for its durability, light weight, and recyclability.



Pillar 4: Business Integrity & Resilience

Operating with integrity and strengthening resilience are essential to how Starkey manages risk, builds trust, and supports long-term performance. This pillar describes how we advance ethical business conduct, responsible sourcing, and supplier accountability across the value chain while strengthening our business through integrated risk management, attention to evolving climate-related and regulatory developments, and protection of sensitive information and digital systems.





Corporate Governance & Board Oversight

Starkey's governance framework is grounded in executive oversight, global compliance standards, and a culture of integrity. As a privately held company, governance oversight resides with executive leadership and the Board of Directors (the "Board"), supported by cross-functional leadership across key business functions.

The Board provides oversight of sustainability-related matters as part of its broader responsibility for strategic direction and risk oversight. Management is responsible for the day-to-day administration of risks and opportunities including those related to environmental, social, and governance considerations, in alignment with the strategic objectives established by the Board.

Rather than operating through multiple specialized committees, Starkey maintains a streamlined governance structure in which risk, compliance, and sustainability considerations are integrated into executive decision-making processes. Our Compliance Committee reports through the General Counsel and supports oversight of regulatory, compliance, ethical conduct, and internal governance practices.

Management provides periodic updates to the Board regarding strategic, operational, and emerging risks, including sustainability-related topics where relevant to Starkey's operations, regulatory environment, and stakeholder expectations. This approach supports informed oversight while allowing governance processes to remain integrated within our broader leadership and compliance framework.

During 2025, Starkey took an important step forward by formalizing aspects of our ESG governance model to support more consistent oversight of environmental, social, and governance considerations and to further integrate sustainability into our overall business strategy. This evolving governance structure is intended to enhance coordination across the organization, clarify roles and responsibilities, and focus attention on the sustainability topics most relevant to Starkey's business, stakeholders, and long-term objectives.

While 2025 represents Starkey's first year establishing a more formal ESG governance structure, we recognize this as a foundational step. Starkey is committed to continuing to strengthen our governance practices over time, including enhancing internal processes, improving data capabilities, and further integrating sustainability considerations into enterprise risk management and decision-making.



Ethics & Accountability

Starkey maintains a Global Compliance Program designed to support ethical conduct, regulatory compliance, and responsible business practices across our operations. The program is anchored by Starkey's Code of Conduct, which outlines expectations for ethical behavior and is reviewed and acknowledged annually by all employees.

To reinforce accountability and transparency, Starkey maintains a standalone Anti-Corruption Policy and provides employees and business partners with access to a confidential ethics reporting channel.

Our **anonymous ethics hotline** allows individuals to raise concerns related to workplace conduct, compliance matters, or other ethical issues without fear of retaliation.

Reported matters are tracked, reviewed and addressed through established compliance and human resource processes. We continue to monitor hotline activity and related governance processes to support early identification and resolution of potential issues and to strengthen oversight of ethical business practices across our organization.





Enterprise Risk Management

Risk management at Starkey is embedded across core functions, including regulatory affairs, quality and compliance, information security, supply chain, finance, and executive leadership. Cross-functional risk discussions occur regularly through global leadership workshops and operational reviews, enabling us to identify and address emerging risks in a timely manner.

These processes currently operate within a distributed governance structure supported by executive review. As we continue to evolve our governance practices, we are evaluating the formalization of a more structured Enterprise Risk Management ("ERM") framework. This forward-looking initiative is intended to strengthen cross-functional risk identification, enhance documentation and reporting consistency, and reinforce Board and executive oversight across strategic, operational, financial, and ESG-related risk domains.

ERM at Starkey is owned by the executive leadership team, with oversight from the Board of Directors, and is informed by input from core business functions, including compliance, finance, supply chain, information security, and operations. This approach reflects Starkey's **integrated governance model**, in which enterprise risks are evaluated and managed through executive decision-making and Board engagement. **This structure helps ensure that material risks are proactively monitored, integrated into strategic decision-making processes, and addressed through appropriate mitigation strategies.**

Supply chain risk management is integrated within this broader governance ecosystem. Supplier agreements include provisions addressing compliance with applicable laws, anti-corruption requirements, and audit rights. Starkey also maintains confidential reporting channels and mechanisms for raising ethical concerns and expects business partners to uphold comparable standards of integrity and regulatory compliance.

By integrating operational, compliance, and supplier risk oversight within a cohesive governance framework, Starkey supports transparency, accountability, and long-term resilience across our global operations. This integrated approach enables us to evaluate a range of emerging risks that may affect long-term operations and strategy, including climate-related considerations and evolving regulatory and market dynamics.



Climate-related Risks & Opportunities

Starkey evaluates climate-related risks and opportunities as part of our broader approach to enterprise risk management through preliminary activities such as regulatory and market monitoring, internal discussions, and supplier engagement.

Our approach to climate-related risk management focuses on identifying environmental issues most relevant to our operations and supply chain, assessing their potential impacts, and implementing processes to monitor and manage these risks over time. As part of these efforts, we published our first [Climate-related Disclosures report](#) in alignment with California's SB 261 requirements, providing additional transparency into how we evaluate and manage climate-related risks.

As we continue to enhance our climate risk assessment processes, environmental data management systems, and emissions measurement capabilities, we expect to refine our assessment methodologies, strengthen connections with financial planning processes, and implement more formal monitoring and reporting practices.



Regulatory & Market Landscape

As a privately held hearing aid manufacturer operating across global markets, Starkey monitors evolving regulatory and market dynamics that may affect commercial operations. Pricing structures, reimbursement environments, and public healthcare programs vary significantly by region. Our commercial approach reflects awareness of these differences while maintaining product compliance and operational continuity.

Starkey monitors regulatory developments through legal, compliance, regulatory affairs, and industry engagement channels. We participate in key industry associations, including European hearing industry working groups, supporting awareness of emerging sustainability, product stewardship, and privacy regulations.

Where appropriate, Starkey applies certain regulatory standards across our global operations even when they are not legally required in specific jurisdictions. This approach reflects our commitment to maintaining consistent product quality, regulatory compliance, and operational integrity across markets.

Through ongoing monitoring of regulatory developments and evolving market expectations, Starkey seeks to proactively manage compliance risks while supporting responsible growth in the global hearing healthcare sector.

Industry Engagement & Policy Collaboration

Starkey participates in several industry and professional organizations to support regulatory awareness, industry collaboration, and responsible business practices.

European Hearing Instrument Manufacturers Association (“EHIMA”)

Participation in Sustainability Committee

Participation in Regulatory Committee

Participation in Technical Committee

Starkey CEO serves on the EHIMA Board

International Association of Privacy Professionals (“IAPP”)

Starkey’s Data Protection Officer and Privacy Counsel are active members



Data Privacy & Cybersecurity

Data privacy and digital trust are critical to maintaining the confidence of patients, clinicians, and business partners. Starkey maintains a dedicated cybersecurity function responsible for protecting the confidentiality, integrity, and availability of data across our global operations. While not positioned as a commercial differentiator, digital trust is viewed as foundational to sustaining long-term relationships with customers and partners. Starkey maintains a global privacy and cybersecurity governance framework designed to meet or exceed regulatory requirements across jurisdictions.

Starkey aligns our cybersecurity program with recognized industry standards, including **HITRUST** and **ISO 27001**, and comply with privacy regulations across multiple jurisdictions, including the **European Union's General Data Protection Regulation ("GDPR")**, China's Data Protection Law, and applicable U.S. state privacy laws. GDPR serves as Starkey's **global privacy baseline**, providing a consistent standard for data protection practices across our operations.



Cybersecurity oversight is supported through Starkey's Compliance Committee, which includes representatives from Compliance, Finance, Legal, and Security. The committee meets quarterly and oversees cybersecurity governance activities, including policy review, risk monitoring, and updates on the organization's security program. Cybersecurity leadership provides regular updates to executive leadership, and meeting records are maintained as part of Starkey's governance processes.

Starkey's privacy program is led by our Data Protection Officer, with additional regional privacy oversight in certain jurisdictions to support compliance with local regulatory requirements. We maintain a public-facing privacy policy governing the handling of patient and consumer data, and individuals may submit data subject requests through a dedicated privacy contact channel.



Cybersecurity Risk Management

Starkey maintains a formal cybersecurity risk management process to identify, assess, and monitor risks related to information systems and sensitive data. We maintain an internal cybersecurity risk register that evaluates enterprise-level risks based on likelihood and potential impact.

Cybersecurity risks are monitored through several mechanisms, including:

- ✓ Annual policy audits conducted through Starkey's Governance, Risk & Compliance system
- ✓ Internal control reviews and remediation tracking
- ✓ Security impact assessments conducted when new projects or operational changes occur

These processes help ensure that cybersecurity and data privacy risks are identified and addressed proactively.

Product Cybersecurity

As a manufacturer of medical devices, Starkey incorporates cybersecurity considerations into our product development. We evaluate our practices in alignment with U.S. FDA cybersecurity expectations for medical devices, helping ensure connected hearing technologies meet regulatory requirements and support the protection of patient data.

Employee Training & Security Awareness

Starkey maintains a global cybersecurity training and awareness program to promote strong security practices across our organization. Employees complete mandatory cybersecurity training and annually review our Global Compliance Handbook, which includes Starkey's key security policies such as the Enterprise Security Policy, Enterprise Privacy Policy, and Acceptable Use Policy.

Additional initiatives include phishing simulations, targeted follow-up training, and participation in Cybersecurity Awareness Month activities. Training outcomes are reported to executive leadership.



**24/7 Security
Operations Center
monitoring**



**Mandatory global
cybersecurity
training**

Security Monitoring & External Expertise

Starkey maintains an outsourced Security Operations Center that provides **24-hour monitoring** of security events and supports investigation and escalation of potential threats. We also **monitor emerging cybersecurity and privacy risks** through professional engagement and external expertise, including participation in the International Association of Privacy Professionals and collaboration with external advisors and industry networks.



Responsible Sourcing Practices

Starkey's global supply chain plays a critical role in ensuring the quality, reliability, and availability of hearing technology that supports patient care worldwide. We maintain a structured supplier management framework designed to safeguard product performance, maintain regulatory compliance, and promote operational resilience. Through disciplined supplier segmentation, risk assessment, and traceability processes, we work closely with suppliers to support continuity of supply, maintain high quality standards, and manage operational risk across our manufacturing and distribution network.

Risk-Based Supplier Risk Assessments

Starkey conducts risk-based supplier risk assessments, with annual review cadence applied to critical and higher-risk suppliers that evaluate:

- ✓ Financial stability
- ✓ Quality performance
- ✓ Capacity constraints
- ✓ Potential disruption risks



Risks are addressed through mitigation planning, alternative sourcing strategies, and ongoing supplier engagement to support supply continuity and product quality.





Supplier Management & Oversight

At Starkey, we maintain a structured, risk-based supplier management framework designed to protect product quality, ensure traceability, and strengthen operational continuity. Suppliers are segmented based on business impact and quality risk, with critical and strategic suppliers subject to risk-based enhanced oversight. This includes formal quality and commercial agreements, performance scorecards, periodic business reviews, and defined escalation protocols where necessary.

We conduct regular, risk-based supplier risk assessments, with annual reviews for critical and higher-risk suppliers, to evaluate exposure across multiple operational and strategic criteria, including financial stability, quality performance, capacity constraints, and potential disruption risks. Identified risks are addressed through mitigation plans, alternative sourcing strategies where appropriate, and ongoing supplier engagement. These processes help reinforce supply reliability while supporting our ability to maintain high standards of product performance and patient safety.

Traceability is embedded within our supply chain operations through documented quality controls, change management processes, barcoding, and system-based tracking mechanisms. Components and finished devices are monitored throughout production and distribution, enabling effective issue resolution, recall readiness, and regulatory compliance.

Supply chain resilience is integrated into Starkey's broader enterprise risk management approach. We continue to enhance our supplier performance scorecards to incorporate additional stability indicators, including exposure to relevant environmental events, geopolitical disruptions, and other external risk factors. By integrating supplier segmentation, risk assessment, and traceability into a cohesive governance structure, we strengthen our ability to manage emerging operational and external risks considerations while ensuring continuity of supply across global markets.





Critical Materials & Sourcing Risks

Certain electronic components used in hearing devices rely on specialty metals and other critical materials. We monitor sourcing risks associated with these inputs, including potential supply disruptions and cost volatility. Engineering teams periodically evaluate alternative materials or design modifications where feasible to reduce exposure to supply disruption or price instability.

We also leverage supplier diversification and proactive sourcing strategies to mitigate concentration risk within key material categories. These efforts are integrated into our broader enterprise risk management processes to support supply continuity and operational resilience.

Human Rights Considerations in the Supply Chain

At Starkey, we expect suppliers to comply with applicable labor, environmental, and regulatory standards as outlined in our contractual agreements. Supplier onboarding processes include qualification reviews and risk-based audits for higher-risk supplier categories. We do not tolerate child labor, forced labor, or unsafe working conditions within our supply chain. Any identified issues are addressed through established corrective action processes and supplier engagement.

We are developing a formal supplier code of conduct that will consolidate our expectations around labor practices, human rights, and environmental responsibility into a single standalone document, further strengthening the governance of our global supply base.



Performance Metrics Tables

The following performance metrics include disclosures aligned with the SASB Medical Equipment & Supplies standard, as well as select company-specific metrics that Starkey believes are relevant to understanding the Company's sustainability priorities, operational performance, and evolving ESG management approach. As this represents Starkey's first comprehensive sustainability report, certain disclosures extend beyond current SASB requirements and reflect areas where the Company has begun establishing baseline data collection, measurement, and governance processes. Starkey expects our sustainability disclosures and underlying data management capabilities to continue evolving over time as reporting processes, systems, and internal controls are further developed and formalized.

SASB-Aligned Performance Metrics

<i>Topic</i>	<i>SASB Code</i>	<i>Accounting Metric</i>	<i>Unit of Measure</i>	<i>Response</i>
AFFORDABILITY & MARKET ACCESS	HC-MS-240a.2	Description of how price information for each product is disclosed to customers or to their agents		Page 34
	HC-MS-240a.3	Percentage change in: (1) weighted average list price and (2) weighted average net price across product portfolio compared to previous reporting period	Percentage (%)	Not Disclosed ¹
PRODUCT SAFETY & QUALITY	HC-MS-250a.1	(1) Number of recalls issued, (2) total units recalled	Number	0
	HC-MS-250a.2	Products listed in any public medical product safety or adverse event alert database		Page 29
	HC-MS-250a.3	Number of fatalities associated with products	Number	0
	HC-MS-250a.4	Number of enforcement actions taken in response to violations of good manufacturing practices (GMP) or equivalent standards, by type of product	Number	0
ETHICAL MARKETING & CLAIM INTEGRITY	HC-MS-270a.1	Total amount of monetary losses as a result of legal proceedings associated with false marketing claims	U.S. Dollar	\$0
	HC-MS-270a.2	Description of code of ethics governing promotion of off-label use of products		Page 31

¹ This metric is not disclosed for the current reporting period, as 2025 represents Starkey's first year of sustainability reporting. Comparable prior period pricing data was not historically tracked in a manner aligned to this disclosure.



Topic	SASB Code	Accounting Metric	Unit of Measure	Response
PRODUCT LIFECYCLE & CIRCULARITY	HC-MS-410a.1	Discussion of process to assess and manage environmental and human health considerations associated with chemicals in products, and meet demand for sustainable products		Page 32
	HC-MS-410a.2	Total amount of products accepted for take-back and reused, recycled or donated, broken down by: (1) devices and equipment and (2) supplies	Number	1.6 million units ²
RESPONSIBLE SOURCING PRACTICES	HC-MS-430a.1	Percentage of entity's facilities participating in third-party audit programs for manufacturing and product quality	Percentage	63%
	HC-MS-430a.1	Percentage of Tier 1 suppliers' facilities participating in third-party audit programs for manufacturing and product quality	Percentage	100%
	HC-MS-430a.2	Description of efforts to maintain traceability within the distribution chain		Page 49
	HC-MS-430a.3	Description of the management of risks associated with the use of critical materials		Page 51
ETHICS & ACCOUNTABILITY	HC-MS-510a.1	Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	U.S. Dollar	\$0
	HC-MS-510a.2	Description of code of ethics governing interactions with health care professionals		Page 43
ACTIVITY METRIC	HC-MS-000.A	Number of units sold by product category	Number	Not Disclosed ³

Other Company-Selected Performance Metrics

OPERATIONAL DATA		Total number of retail clinic locations	Number	371
		Total number of global sites and manufacturing facilities	Number	29
EMPLOYEE ENGAGEMENT & COMPANY CULTURE		Total number of global employees	Number	5,231
CLIMATE & ENVIRONMENTAL IMPACT		Gross global Scope 1 direct GHG emissions	Metric tons CO ₂ e	1,452 ⁴
		Gross global Scope 2 indirect GHG emissions	Metric tons CO ₂ e	6,000 ⁴
APPROACH TO WASTE ACROSS OPERATIONS		Total amount of recycled electronic waste	Metric tons	25

² As part of Starkey's first year of sustainability reporting, available data for this metric is currently tracked by number of devices processed through the recovery program rather than by weight. Starkey does not currently track returned items by the specific breakdown categories requested by SASB.

³ Starkey has elected not to disclose unit sales by product category, as this information is considered commercially sensitive and not currently included within the scope of external reporting practices.

⁴ Scope 1 and Scope 2 emissions were calculated using a combination of actual activity data and estimation methodologies, depending on data availability across global operations. Certain locations utilized utility consumption records and operational data, while others incorporated cost- or spend-based estimation approaches where complete activity data was not available. Emissions calculations applied applicable country- or region-specific emission factors and were developed in alignment with the GHG Protocol Corporate Accounting and Reporting Standard.



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