



Pol-0505

Anti-corruption policy





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1. Purpose

The purpose of our Code of Conduct (CoC) policy for Anti-corruption is to describe Guldmann's position on how to ensure that the organisation and our Partners understand our zero tolerance for corruption.

2. Responsibility

The top management is responsible for ensuring that CoC policies are known and respected throughout the organisation and the external partners, we collaborate with (Suppliers and Distributors – called Partners). The top management is also responsible for taking action if we or our Partners fail to comply with our CoC policies.

3. Our purpose

Guldmann – Time to Care

Under the Guldmann brand name, we focus on improving work procedures and the working environment in the health and care industries, in which moving, lifting and positioning, as well as mobilisation and rehabilitation, are prime concerns.

Furthermore, our development of a Trainer Module intended for early rehabilitation via mobilisation and gait training contributes to increased health and well-being as well as supporting work environment for health personal.

Stepless – Access for All

Under the Stepless brand name, we provide accessibility. Stepless products provide people with walking difficulties, wheelchair users and others dependent on wheeled movement with easier, more dignified access to the world facing them.

4. Guldmann FACT of LIFE

Our corporate values are fundamental and reflect the entire company's culture. Therefore, it is crucial to have a clear link between the values and our policies and processes.

Guldmann FACT of life:

Flexibility

We know that whatever may be right today may well be wrong tomorrow. We have no patent on the truth – and act accordingly.

**Ambitions**

We set high, shared goals – and strive for continual improvement.

Competence

We know what we are talking about. The skills and knowledge of each individual make up our shared strength.

Trustworthiness

We make sure people trust us, by trusting one another.

The Guldmann values frame our ethical compass and expectations, for the way we, as Guldmann employees, act individually and as an organisation.

5. Binding Obligations (Compliance Obligations)

Below are the most important binding obligations with respect to Guldmann's Code of Conduct

- UN Universal Declaration of Human Rights
- OECD Guidelines for Multinational Enterprises
- The Ten Principles of the UN Global Compact, including
 - Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery
- Legislation applicable in the countries in which we or our co-operation partners operate

6. Anti-corruption policy

Guldmann takes a zero-tolerance approach to bribery and corruption of all kinds. This reflects our Guldmann FACT's and promotes openness and transparency to seek the highest professional standards across its areas of activity.

The zero-tolerance approach applies to all Guldmann employees and our Partners. Employees must not offer, promise, or give bribes and they must not request or receive bribes.

All Guldmann employees are obliged to immediately inform the management if they suspect or become aware of any violation of the anticorruption policy internally in the organisation or at our co-operation partners. All reporting will be handled sensitively and Guldmann is committed to ensuring that no employee who reports a corruption concern in good faith suffers any detrimental effect for doing so.

Guldmann also requires its Partners to report any malpractice to the Guldmann management.

7. Compliance with the Anti-corruption policy

To ensure Trustworthiness between our policy and what we do in practice, we have documented processes and procedures that support our policies and activities.

In connection with onboarding, all new employees are made aware of Code of Conduct, our culture, expectations and policies and they are told to contact their immediate

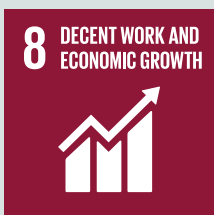


manager, superior manager or HR department if they have any suspicion of corruption. An Internal whistle-blower scheme will be implemented (in 2023).

Guldmann management will take action and handle any violation of this policy. To ensure compliance with Guldmann's CoC policies at Partners, we have implemented a documented system for management and auditing of our Partners.

8. The 17 SDG – Sustainable Development Goals

Guldmann's anticorruption policy supports especially SDG no. 8 for sustainable development.



Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

- Implementation of Guldmann Academy:
 - ensuring communication of expectations and training in the policy throughout the organisation
 - training of distributors

Our main goal is to create Access for All and Time to Care

9. Audit

At Guldmann, we have developed a documented audit system. We have done this to ensure conformity between our management system, the internal requirements and our binding obligations and to determine whether our related systems and processes have been effectively implemented and maintained.

The audit system covers all parts of our management system and is supported by a team of trained and competent auditors who audit selected parts of the system regularly.

The audit system also comprises systematic audit of our Partners. Audits of these are established based on a risk analysis of the countries in which our Partners operate and where our CoC policies are likely to be violated.

10. Approval and signature

A handwritten signature in black ink, appearing to be "CG", written over a horizontal line.

Carsten Guldmann
Chief Executive Officer