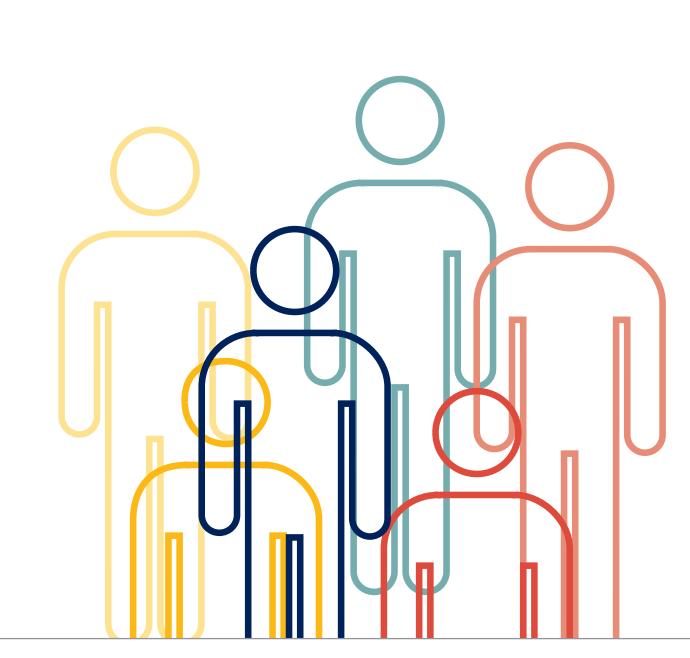


Pol-0502 Human rights policy



Guldmann™



	Contents	
	Contents	1.Purpose22.Responsibility23.Our purpose24.Guldmann FACT of LIFE35.Binding Obligations (Compliance Obligations)36.Policy for Human Rights37.Compliance with Labour Rights policy48.The 17 SDG – Sustainable Development Goals49.Audit410.Approval and signature5
1.	Purpose	The purpose of our Code of Conduct (CoC) policy for human rights is to send a clear and precise signal that the internationally recognised human rights must be respected throughout our supply chain.
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 posi-

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.

tioning, as well as mobilisation and rehabilitation, are prime concerns.

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)

- UN Universal Declaration of Human Rights
- OECD Guidelines for Multinational Enterprises
- The Ten Principles of the UN Global Compact, including
 - Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.
 - Principle 2: Make sure that they are not complicit in human rights abuses
- Legislation applicable in the countries in which we or our Partners operate

6. Policy for Human Rights

We comply with the applicable legislation and support the internationally recognised human rights, including the freedom of speech, freedom of religion and freedom of association, the fight against racism, discrimination and forced labour and child labour. (Our policy for labour rights elaborates further on this).

All subsidiaries in the Guldmann group are covered by the above policy, and we expect that our Partners live up to this policy.

We do not accept violations of human rights, whether directly in our business or indirectly through our Partners.

All Guldmann employees are obliged to immediately inform the management if they become aware of any violation of the human rights internally in the organisation or at our Partners.



7. Compliance with Labour Rights 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. Compliance with the human rights is supported by our policy and processes for ensuring labour rights.

We take an active stand and act in specific situations, such as: (examples)

- Guldmann Omsorgsfond (Charity Foundation)
- Sponsorship Sailing
- Dissociation from the acts of war in Ukraine
- Humanitarian and economic aid for Ukraine (for employees as well as aid organisations/ the general Ukrainian population)
- Social investments through donations for charity in the countries where we have subsidiaries
- (Donations to activities, organisations, or projects that through their actions are providing those who are less fortunate and in need, with more Time to Care)

To ensure compliance with Guldmann's CoC policies at our co-operation partners, we have implemented a documented system for management and auditing of our co-operation partners.

8. The 17 SDG – Sustainable Development Goals

Guldmann's labour rights policy and the continuous improvement activities support 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

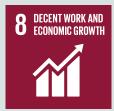
- Implementation of Guldmann Academy:
 - ensuring that the level and completion of training are increased for employees throughout the organisation
 - training of distributors
- Our mission is to create Access for All and Time to Care

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

Carsten Guldmann Chief Executive Officer

Guldmann™