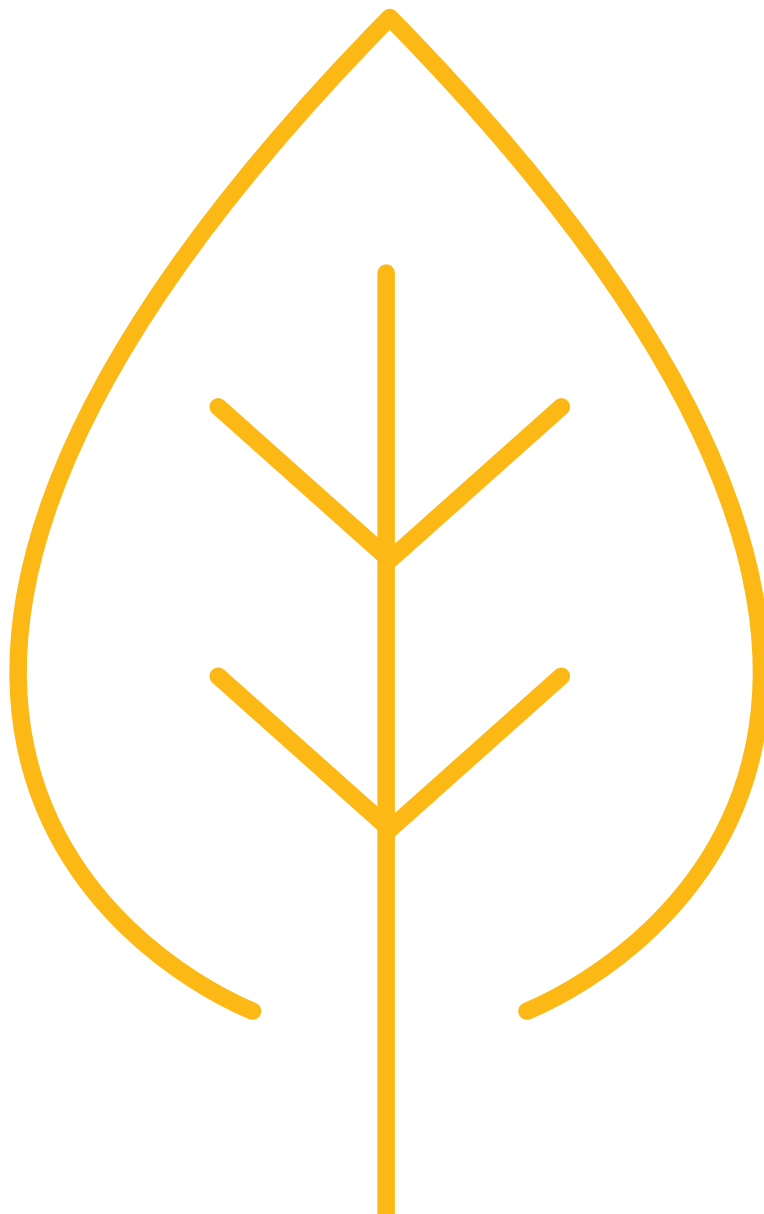




Pol-0504

Environmental policy





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1. Purpose

The purpose of our Code of Conduct (CoC) environmental policy is to describe Guldmann's position on how we act with respect to resource consumption, waste, and recycling for a continued sustainable development.

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
- UN Global Compact – Environment
 - Principle 7: Businesses should support a precautionary approach to environmental challenges.
 - Principle 8: undertake initiatives to promote greater environmental responsibility; and
 - Principle 9: encourage the development and diffusion of environmentally friendly technologies
- DS/EN ISO14001:2015 (V. Guldmann A/S)
- Legislation applicable in the countries in which we or our Partners operate

6. Environmental policy

At Guldmann we will work actively to ensure that the negative impact that we can control is minimised. We will also work to directly or indirectly contribute to a positive environmental impact.

Guldmann's Ambition is to ensure ongoing improvement of our environmental management system and its performance by

- I. Working closely with our suppliers to ensure that we use materials and processes that are as sustainable as possible.



- II. Continuously minimising the relative amount of waste and emissions and to ensure the highest possible degree of recycling.
- III. Ensuring that our products do not have an unnecessary negative environmental impact in connection with use, recirculation and possibly destruction
- IV. Complying with the applicable legislation
- V. Ensuring ongoing improvement of our environmental management system and associated environmental performance

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

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

This considers the economic and technological resources at our disposal and our general financial goals for the company and based on our fundamental values.

7. Compliance with the Environmental policy

At V. Guldmann A/S, we have a certified ISO14001 environmental management system to increase focus on the continuous environmental improvements and to ensure the sustainable development of our products and processes. To ensure Trustworthiness between our policy and what we do in practice, we have documented processes and procedures that support our policies and activities.

- I. In connection with our product development and change management process, we work closely together with our suppliers to increase sustainability for our products. This is done based on a life cycle perspective with focus on choice of materials as well as production processes. The handling and documentation of these processes are described in our procedures for Design & Development and in our change management procedure. The documentation is handled through M-Doc and our RFC system.
- II. Based on our environmental management system and in collaboration with our suppliers, we are constantly initiating new activities in our processes to minimise our environmental impact, for example by increasing the number of fractions for recycling, replacing packaging materials with more sustainable materials and reducing the volume of packaging for our products. All these activities are continuously documented through our idea and continuous improvement reports in our Q&E management system.
- III. Use, recycling and disposal of Guldmann's products are also a permanent part of the design and development process to avoid unnecessary negative environmental impact. These activities are also described in our procedure for Design & Development. In practice, this is implemented by descriptions in our user manuals on use and disposal of our products.



- IV. To ensure compliance with applicable legislation, Guldmann has a documented process for handling our binding obligations. This process has been developed to ensure ongoing review of existing obligations and implementation of new/changed obligations for our products, processes and systems. Guldmann's subsidiaries are responsible for ensuring fulfilment of national binding obligations in the country in which they operate, as are our suppliers and distributors in the countries in which they operate.
- V. We ensure ongoing improvement of our environmental management system by continuously initiating and implementing environmental improvement activities. This is documented and verified through our certified environmental management system and assessed by the executive management at our scheduled meetings for the management's assessment of the environmental management system. To ensure compliance with Guldmann's CoC policies at our Partners, we have implemented a documented system for management and auditing of our Partners.

8. The 17 SDG – Sustainable Development Goals

Guldmann's CoC policies and the related improvement activities support several of the 17 SDG.

However, we have decided to focus on global goal no. 8 (Decent work and economic Growth), no. 12 (Responsible consumption and production). The aim is to ensure focus on these specific Sustainable Development Goals and related continuous improvement activities.



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
 - seminars for customers



Goal 12: Ensure sustainable consumption and production patterns.

- Example of Guldmann activity: Sorting of production waste in several fractions for increased recycling



Goal 13: Take urgent action to combat climate change and its impacts

- Ex. Guldmann activity: Solar panels on the roof to support renewable energy



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, consisting of a large, stylized 'C' followed by a series of loops and a horizontal stroke at the end.

Carsten Guldmann
Chief Executive Officer