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1. **Purpose**

The purpose of this statement is to elaborate on relevant areas in relation to our Head Office's Code of Conduct policies, to be able to place products on the English market.

2. **Relation**

The statement is supported by Guldmann’s global Code of Conduct policies.

- Pol-0504 Environmental policy
- Pol-0502 Human rights policy
- Pol-0503 Labour rights policy
- Pol-0505 Anti-corruption policy

3. **Background**

V Guldmann A/S develops, manufactures and markets Lifting Equipment for the Healthcare Sector, providing technical aids for the disabled and working tools for their careers.

Given the nature of our business, the management team consider that there is minimal risk that, either within V Guldmann A/S or the immediate supply chain that support our business activities, are in any way involved in or supportive of slavery and human trafficking.

4. **Responsibility for the Statement**

The board of directors has overall responsibility for ensuring this statement complies with our legal and ethical obligations, and that all those under our control comply with it.

The Managing Director has primary and day-to-day responsibility for implementing this statement, monitoring its use and effectiveness.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this statement and are given adequate and regular training on it and the issue of modern slavery in supply chains.

5. **Statement**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

V Guldmann A/S has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships. We expect the same high standards from our contractors, suppliers, and other business partners. We expect that our suppliers will hold their own suppliers to the same standards. This statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, contractors, external consultants, and business partners.

6. **General**

We operate a number of internal statements to ensure that we are conducting business in an ethical and transparent manner.

These include the following.

- Recruitment and selection statement

We conduct checks on all prospective employees to verify that they are eligible to work in the UK. Certain roles require a Disclosure and Barring Service (DBS) check, where employees may be working with vulnerable people.

- Whistleblowing Statement

We operate this statement so that employees are able to raise concerns about how staff are being treated or practices within our business or of our supply chains without fear of reprisal

- Staff Code of Conduct

We Are committed to the fair treatment of all staff. Our staff code of conduct reflects our core values and expected behaviours. The code of conduct makes it clear that we have a zero-tolerance approach to modern slavery

We make sure our suppliers are aware of our policies and adhere to the same standards

6.1 **Due Diligence**

As part of our efforts to monitor and reduce the risk of slavery and human trafficking in our supply chains, we have adopted the following due diligence procedures

- Checking installers with external Third Parties for any slavery or human trafficking risks.

Our due diligence procedure aims to;

- Identify and action potential risks within our install supply chain
- Monitor potential risks in our install supply chain
- Reduce the risk of slavery and human trafficking occurring in our install supply chain
- Provide protect for whistle-blowers

6.2 Risk and compliance

Guldmann has evaluated the nature and extent of its exposure to the risk of slavery and human trafficking occurring in its UK install supply chain through.

- Evaluating the slavery and human trafficking risks of each new installer
- Creating and annual risk profile for any new installers
- Reviewing all installers periodically when new or replacement employees are employed

We do not consider that we operate in a high-risk environment as our install supply chain are Guldmann installers, of long standing and undertake DBS checks for working within live Hospital environments.

Installers are also required to travel to Denmark every 2 years for re-training and undergo appropriate Border Controls, for unrestricted re-try into the UK.

6.3 Effectiveness

Guldmann will use Key Performance Indicators (KPI's) to measure its effectiveness and ensure that slavery and human trafficking is not taking place in its business and supply chain. These KPI's are;

- Guldmann staff to receive training about modern slavery issues and how to raise awareness within Guldmann
- 50% of installers will be audited annually as part of their annual Installers Questionnaire.

Where there are any concerns on any aspect of slavery or human trafficking, the installer will be asked to provide further information to support the employee.

6.4 Communication and Awareness of this Statement

Training on this statement, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

New employees will be asked to complete the Modern Slavery Training resource page at <https://www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page>

The training will cover;

- The initial steps to be taken if slavery or human trafficking is suspected
- How to escalate potential slavery or human trafficking issues to the relevant party with Guldmann
- What external help is available.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

7. Breaches of this Statement

Any employee who breaches this statement may face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this statement.

8. Approval and signature

Date: Sep 2 2024

Signature: 
Carsten Guldmann
Chief Executive Officer

Date: 2/9/24

Signature: 
Mark Osborne
Country Manager UK