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1. Purpose

The purpose of our Code of Conduct (CoC) policy for Labour rights is to describe Guldmann’s basis for continuously ensuring a good, inspirational and safe working environment for all.

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)

- UN Universal Declaration of Human Rights
- OECD Guidelines for Multinational Enterprises
- UN Global Compact – Labour rights
 - Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; and
 - Principle 4: support the elimination of all forms of forced and compulsory labour; and
 - Principle 5: support the effective abolition of child labour; and
 - Principle 6: eliminate discrimination in respect of employment and occupation
- Legislation applicable in the countries in which we or our partners operate.

6. Labour Rights policy

Based on Guldmann's fundamental purpose Time to Care and Access for All, we continuously work to improve the working environment and safety for our customers. With our welfare technology for people with reduced capabilities, and work tools for those who help and care, we contribute to create decent (working) conditions.

We are constantly striving to ensure a healthy working environment for our employees and to create inspirational and satisfying work for all our employees.

Our **Ambition** at the Guldmann Group is to ensure freedom for all to work, make decisions and act to achieve the common business goals. This is supported by

- I. Ensuring that our products contribute to improving the working environment at the places where they are used
- II. Ensuring and respecting freedom of association for all
- III. We do not accept forced labour and child labour
- IV. Ensuring a good, safe and inspirational working environment without discrimination for all regardless of gender, race, religion and sexuality
- V. Through agreement on employment and association conditions, ensuring that we comply with applicable legislation and collective agreements entered into.
- VI. We have Guldmann standards that ensure good working and welfare conditions for all employees regardless of location.

All subsidiaries in the Guldmann group are covered by the above policy, and we expect that our co-operation 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 labour rights internally in the organisation or at our co-operation partners.

This is taking into account 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 Labour Rights policy

The company's culture and values support the policy, including respect for and credibility in relation to the individual and us as a company.

At the Guldmann group, our goal is to be an attractive workplace with committed employees where their competence development and job satisfaction form a principal foundation for the company's development. We develop and operate a result-oriented company with a good and inspiring working environment focussed on cultivating the company's culture.

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

Re. I – III: We ensure our policy on freedom of association, forced labour and child labour through

- Contracts of employment for all
- Master data for all employees
- Overview of applicable local and collective agreements
- Communication and training

Re. IV: We are constantly striving to ensure a good, safe and inspirational working environment without discrimination through

- ongoing dialogue between manager and employees and through an annual talk
- working environment committees
- recruitment processes
- communication and training (Guldmann Academy, on-boarding, internal training)

Re V: We ensure compliance with applicable legislation, collective agreements entered into and local agreements by

- making references in our contracts to legislation, collective agreements and local agreements entered into
- ensuring communication of agreements to the respective employee groups who will carry out administration according to these.
- Finance and HR are responsible for keeping up to date on applicable and new legislation within the area.
- At Guldmann's subsidiaries, the local management is responsible for ensuring fulfilment of national binding obligations in the country in which it operates.

Re. VI: We ensure good working and welfare conditions by

- Continuously developing and optimising our facilities (such as renovated canteen and changing and bath facilities at production site in the Ukraine. Extension in the form of R&D office facilities and changing and bath facilities).

Guldmann's values and expectations for our managers as culture carriers are discussed in connection with recruitment. In connection with the employment of managers, "Guldmann manager profile" is used. It describes Guldmann's values, culture, approach and expectations for a manager.

In connection with on-boarding, all new employees are made aware of our values and culture, expectations and policies, and they are told who to contact with any input (Managers, HR or representatives in local working environment committees).

An Internal whistle-blower scheme will be implemented (in 2023).

Labour rights are communicated internally and to our co-operation partners. The policy is communicated to customers upon request.

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
 - seminars for customers
- 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

Date: 15-07-2022

Signature: 

Carsten Guldmann
Chief Executive Officer