

Code of Conduct

Introduction

Our Code of Conduct is an important part of Handicare and it defines the standards under which we conduct our business responsibly and how we behave. The Code is presented in three general areas: Anti-corruption and Ethics, Labour Standards and Human Rights, and The Environment.

The Code of Conduct embodies standards of business conduct and ethics that all employees, managers, executive officers, members of the board of directors and business partners must follow.

These standards are based on sound business practice, responsibility, and common sense, and are intended to encourage a high degree of personal and professional integrity.

Understanding and complying with the Code of Conduct

Handicare expects that all employees understand and comply with the Code of Conduct. Each manager is responsible to ensure that the employees receive the necessary information and training. Yearly audits will be conducted by the Code of Conduct council to certify that all employees have the proper training. Problems encountered in enforcement as well as comments or suggestions for improvement should be escalated in line with standard reporting procedures. Handicare also expects all of its business partners to adhere to similar standard in their own business. Moreover, compliance to the standard is of great importance in Handicare's selection of future business partners.

Violation of the Code of Conduct

Handicare does not tolerate any illegal or unethical acts. Anyone violating the Code of Conduct may be subject to disciplinary action, up to and including termination of employment. Furthermore, violating the law could lead to criminal fines, prison terms or civil damages for Handicare or our employees.

Raising concerns

To allow employees to raise concerns about wrongdoing, we have established procedures for reporting and follow up. The employee should first contact immediate supervisor or manager if not applicable please visit Handicare Whistleblowing site for more information.

Anti-Corruption and Ethics

Competition

Handicare and our employees follow applicable competition law regarding abuse of dominant market position and Employees do not engage in discussions with competitors regarding market allocation, information exchange, production and sales quotas, or bid rigging. Breaches of competition rules may lead to high fines and damages.

Do's & Don't

Do:

Proceed very carefully when interacting with competitors (meetings, e-mails, phone calls, socialising, etc.) and in any market in which Handicare may have a dominant position.

Consider whether a proposed activity or agreement involves a competition law related risk. Seek guidance if you are unclear about your competition law responsibilities.

Respond to anti-competitive offers or suggestions in a way that makes it very clear that Handicare does not wish to be involved and immediately end the discussion or contact. Ensure that there is a written record of this response.

Don't

Discuss with competitors or remain where competitors are discussing topics which may have an impact on competition such as pricing, business terms, allocation of geographic regions, customers, products or market shares, costs and capacities, production or sales quotas, tendering procedures, or any similar matter.

Exchange or otherwise share information with competitors about any of the above or similar matters.

Anti-bribery

Handicare refuses to accept or retain business through bribery. Employees do not directly or indirectly offer, promise, grant, or authorize the giving of money or anything of value to someone to unduly influence the recipient in the performance of professional duties or in order to obtain or retain an improper business advantage. Employees do not ask for or accept improper benefits from others for performance of their duties to Handicare. Applicable anti-bribery laws are strictly followed.

Do's & Don't

Do:

Pay specific attention to the public sector, including both public officials and politically exposed persons, and keep in mind the specific limitations which apply.

Conduct third party risk assessments.

Trust your instincts. If they suggest something is not right, consult with your supervisor.

Don't:

Offer, promise, or authorize the giving of money or anything of value to anyone with the intent to unduly influence the performance of the recipient's (or someone else's) professional duties or to retain or obtain an undue business advantage.

Accept, accept a promise of, or request money or anything of value from someone other than Handicare for the performance of your own professional duties as an employee or representative of Handicare.

Trade sanctions

Handicare complies with United Nations sanctions and applicable sanctions under the laws of the European Union and the United States. Employees never attempt to circumvent applicable trade sanctions.

Conflict of interest

Employees avoid situations in which their own personal interest, or the interest of their family members, affect the employee's ability to make decisions that are in the best interest of Handicare. Every business decision is based on the best interests of the Handicare, not personal interests.

Labour Standards and Human Rights

General

Handicare does not compromise on requirements set out in national law or international standards with regard to worker safety and human rights.

We take responsibility for all people participating in the conduct of its business. Those whose work contributes to Handicare business success are not deprived of their human rights, or subject to mental or bodily harm in their labour. We understand that our business may have an impact on human rights issues, in particular in relation to people's working and living conditions.

Handicare complies with all relevant international covenants and conventions as well as all laws which are applicable to worker safety and working conditions for labourers.

Privacy

Confidential personal information is safeguarded and employees follow applicable laws on the handling of personal data. Data is disclosed to

third parties only when legitimate grounds to do so have been established and appropriate measures have been taken to protect the personal data to be transferred.

Working Conditions

We provide a healthy and safe work environment for our employees and constantly strive to make working conditions even better. Abuse (whether physical or verbal) and unlawful harassment are strictly prohibited. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.

Do

Partake in relevant safety training

Present ideas for improving work environment

Don't

Disregard safety instructions

Equal Opportunity and Anti-discrimination

All employees at Handicare are treated with dignity and respect. We provide equal opportunities to everyone. Discrimination or harassment based on race, ethnicity, gender, physical disability, sexual orientation, or religion is not tolerated. All employees with the same qualifications, training, and skill set receive equal pay for equal work. Handicare values and will continue to develop diversity of its workforce.

Do

Provide a work environment that is free of aggressive, threatening or bullying behaviour

Report any discrimination or harassment

Wages and Benefits

Wages and benefits paid for a standard working week shall as minimum meet national legal standards. All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.

Working hours shall comply with national laws. Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided through the use of short term contracting (such as contract labour, casual labour or day labour), sub-contractors or other labour relationships.

Forced Labour

Handicare does not, directly or indirectly, use forced labour or other forms of involuntary labour, including prisoners, bonded workers, illegal workers, or other non- paid workers

Child Labour

Handicare recognizes and honours the rights of every child to be protected from economic exploitation and from performing any work that is likely to be hazardous, to interfere with the child's education, or to be harmful to the child's health or physical, spiritual, moral, or social development. We comply with applicable law and international standards regarding child labour.

Political Involvement

Employees are free to express their political views and engage in political activities outside of working hours without retribution or discrimination in the workplace. Employees may not, however, use Handicare's name or property to further their personal political interests.

Labour Unions

Employees are free to join labour associations of their own choosing and to be part of, or included in, collective bargaining.

Modern Slavery Act 2015, chapter 30

Handicare and its employees is aware of the act about slavery, servitude and forced or compulsory labour and about human trafficking, and ensures there is no exploitation of employees

The environment

Handicare complies with all applicable environmental laws and regulations. Environmental resources are used responsibly and carefully, and we constantly strive to conduct our business in an environmentally sustainable way, by way of, for example, improved efficiencies or investment in sustainable products, services, and technologies. Ideas from employees that reduce the environmental impact of Handicare activities are supported and encouraged.