

Modern Slavery Act Statement – FY2019

Slavery and Human Trafficking Transparency Statement for the financial year ending 31st December 2019

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that Handicare Accessibility Ltd ('Handicare') is taking to ensure that slavery and human trafficking is not operating within either its own business or its supply chains.

This Statement has been approved and signed by Handicare Accessibility Ltd.'s Board of Directors.

Handicare's Organisational Structure and Supply Chains

Handicare is a global company with manufacturing facilities in Europe, US and Asia. At Handicare we are committed to making everyday life easier for disabled and elderly people and supporting those who assist them. Our products and solutions include curved and straight stairlifts, transfer, lifting and repositioning aids. We are approximately 1,040 employees globally. In 2019, revenue totalled MEUR 271.

Handicare sources a wide range of goods and services from suppliers based in the United Kingdom and overseas as described above. In its dealings with those suppliers it strives to ensure that the highest ethical standards are attained at all times. Handicare has close relations with most of the company's suppliers and our assessment is that the risk of human rights violations amongst our suppliers is low.

However, as part of Handicare's commitment, there has been an increased focus on the requirement for our suppliers to eradicate slavery and human trafficking in their own businesses and supply chains.

Handicare's Policies and Due Diligence

Handicare strives to ensure that it does not contribute towards adverse human rights impacts both internally and through its supply chains. There is an ongoing commitment to engage only those suppliers that uphold the same principles as Handicare and where necessary ensure the implementation of corrective action measures.

In the event that suppliers fail to take steps to cease or prevent adverse human rights impacts, Handicare will reconsider its business relationships with those suppliers.

All direct product procurement activity is conducted within the framework of Handicare's purchasing policy, which describes our external policy for suppliers. It includes a Supplier Code of Conduct, which is

based on ethical, societal and environmental topics and describes Handicare's expectations in three general areas:

- anti-corruption and ethics;
- labour standards and human rights; and
- Environment.

In light of the Modern Slavery Act 2015 it was updated in 2017 to include clauses pertaining to modern slavery.

From 2018, all major suppliers have been asked to send back a document stipulating they have read, understood and commit to adhere to the revised Group Purchasing Policy.

From 2018, supplier audits carried out now include a Modern Slavery and Human Trafficking compliance audit.

As part of our wider commitment to promoting ethical business practices Handicare has also adopted a Corporate Compliance Programme which provides a framework for the below overarching policies and details the approach to training of these policies and internal audit.

- Handicare Code of conduct. The Code of Conduct sets forth Handicare's core principals. It includes a letter from the board of directors and a description of the Company's stance on key issues in three general areas: anti-corruption and ethics, labour standards and human rights and the environment.
- Handicare's employee handbook has been updated to include modern slavery awareness in the safeguarding policy and procedure.
- Whistleblowing Policy and Whistleblowing system. Employees and Suppliers have the opportunity to report any misconduct or concerns via an anonymous Whistleblowing service.

2019 Improvement Activities

- In our commitment to train those individuals in roles most likely to be in a position to identify and address instances of modern slavery, all purchasing, supply chain and HR associates received refresher compliance and awareness training. We have also added modern day slavery e-learning to our new starter induction programme.

- We have also added further clauses to our supplier audit programme to ensure suppliers are also implementing due diligence procedures in their own supply chains.

Continued Due Diligence

- Internally we will continue in our associate awareness programme by adding a modern slavery awareness campaign to our globally distributed e-newsletter.
- We will extend our supplier reach to also include our major indirect suppliers and contractors, ensuring they commit to adhere to our Supplier Code of Conduct.

Approval by Handicare Accessibility Ltd.'s Board of Directors

I, Peter Slack, hereby certify that the information contained in the above FY2019 Slavery and Human Trafficking Transparency Statement is factual and has been approved by Handicare's Board of Directors.

Signed:



Name: Peter Slack

25th September 2020