

# Modern Slavery Statement

This Statement is made pursuant to Section 54 of The Modern Slavery Act 2015 and constitutes the statement for Sunrise Medical Ltd for the financial year ending 30th June 2022.

## About us and our Supply Chain

Sunrise Medical Ltd design, manufacture and distribute manual wheelchairs, powered wheelchairs, mobility scooters, mobility aids and both standard and customised seating and positioning systems. We source the majority of our goods and services, including the raw materials and components for our products, through our UK based purchasing team, primarily from countries based in Europe, the USA and Asia. Production takes place in the UK, USA, Mexico, Germany, Norway, Holland, Poland, Spain, China and Australia. We supply our products directly, via our subsidiaries and branches in Europe and the USA and through our worldwide network of distributors.

## Our Policies

We strongly believe in fair working practices and we have zero tolerance of slavery and human trafficking. This principle is enshrined in our “**Do The Right Thing**” policy which is our Code of Business Conduct, which every employee of the Sunrise Medical Ltd UK site and its subsidiary companies must adhere to, and which is published on our internal intranet and external website. In addition, via our **Do The Right Thing** policy we encourage our employees to report concerns relating to slavery and human trafficking without fear of recrimination.

## Due Diligence and Assessment of Risk

Our key suppliers (assessed according to criticality, risk and value) undergo regular quality audits (which may include physical inspections) and before appointment our distributors are always subject to full due diligence. Both processes are documented and contain specific questions to assist in the identification of potential slavery and human trafficking.

Prior to trading, all new suppliers to the UK business must commit in writing to the principles enshrined in our **Do The Right Thing** policy to ensure that we only trade with suppliers whose values are akin to our own. This is reinforced on each purchase order we raise.

Specific checks are in place to identify any suppliers based in countries considered to be high risk on the Global Slavery Index.

Through our contracting process with our suppliers, distributors and customers we promote compliance with the Modern Slavery Act both in form and spirit.

Internally we verify the identity and right to work of every employee by inspecting original passports and visas to ensure that there are no potentially vulnerable employees. We only use agencies that have been verified through our internal due diligence processes.

Any concerns arising from the above processes are escalated to senior level.

## Training

Our **Do The Right Thing** training program provides training for all senior managers, as well as relevant employees in functions such as HR, Purchasing, Commercial and Distribution to identify potential slavery and human trafficking and how to report it.

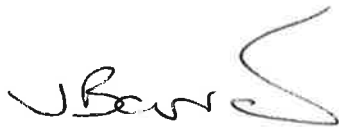
All new employees and consultants commit to our **Do The Right Thing** policy during their induction process.

## Review

Sunrise Medical's Chief Financial Officer is ultimately responsible for ensuring the effectiveness of and the Group's compliance with all policies, procedures and training requirements set out in this statement. This includes an annual review with the Board to ensure our continual improvement in this key area of our **Do The Right Thing** policy.

## Board Approval

This statement has been approved by the Board of Sunrise Medical Limited.



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Jim Barratt  
SVP Northern Europe & Asia Pacific  
Sunrise Medical Group



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Adrian Platt  
SVP and Corporate CFO  
Sunrise Medical Group