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To our stakeholders:

I am pleased to confirm that BraunAbility reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture, and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Staci Kroon  
President & Chief Executive Officer  
BraunAbility

## **Human Rights**

### **Assessment, Policy, and Goals:**

The core purpose of our business, mobility transportation products for persons with physical disabilities, supports and enhances human rights, as our products provide mobility and independence to wheelchair users around the globe, changing their lives for the better. In 2018, BraunAbility launched a “Save My Spot” campaign, which is designed to raise awareness of respecting parking spots reserved for persons with physical disabilities. BraunAbility employees volunteered their time to paint markings on these parking spots within the community in which BraunAbility does business.

To further evidence our company’s commitment to human rights, we updated our company values in 2018 to specifically include “Serving as a Champion” for persons with disabilities, with the goal of setting the expectation for human rights advocacy in this area. Our Code of Conduct continues to outline the company’s expectations from employees and illustrate how human rights tie into our corporate values, while our whistleblower reporting system allows the concerns of our employees to be easily and anonymously reported. Our Supplier Code of Conduct ensures this same commitment from our business partners.

### **Implementation:**

In 2018, information on the Save My Spot campaign was presented to all employees and our updated company values were introduced to all employees.

Our Supplier Code of Conduct was electronically implemented to suppliers.

In addition, BraunAbility maintained a whistleblower hotline for employees to submit their complaints or concerns with regards to unfair treatment in the workplace. These reports are immediately investigated and reviewed by top management.

### **Measurement of Outcomes:**

- Over seventy employees volunteered to help paint over one hundred handicap parking spots in our local community.
- Three whistleblower hotline reports were logged and fully investigated, with a written report provided to our Compliance Officer.
- Suppliers that make up 90% of BraunAbility’s annual spend budget reviewed and acknowledged our Supplier Code of Conduct.

## **Labor**

### **Assessment, Policy, Goals:**

Both our BraunAbility Code of Conduct and Supplier Code of Conduct highlight our commitment to the elimination of all forms of compulsory and child labor. In addition, our Employee Handbook makes clear that BraunAbility is an “employer at will”, meaning employees have the right to leave their employment at any time.

In addition, our Employee Handbook and Code of Conduct include the right to collective bargaining, and the Employee Handbook also includes several prohibitions with respect to discrimination, including a commitment to a workplace free of all types of harassment and discrimination, as well as a zero-tolerance policy regarding workplace violence.

In addition, in 2018, our focus was expanded to include the benefits of workplace diversity.

### **Implementation:**

BraunAbility raised awareness on labor rights among its employees by conducting a companywide “respectful workplace campaign” that included month long campaigns on topics including zero-tolerance for workplace violence, harassment, and the benefits of diversity in the workplace.

### **Measurement of Outcomes:**

- All supervisors conducted team discussions on zero tolerance for workplace violence, harassment, and the benefits of a diverse workplace.
- Three whistleblower hotline reports were logged and fully investigated, with a written report provided to our Compliance Officer.

## **Environment**

### **Assessment, Policy, Goals:**

As part of our 2018 corporate compliance program, we were successful in achieving ISO 14001:2015 Certification. We reassessed our environmental aspects, impacts, and risks and found no change from 2017. Therefore, we continued with four reduction goals, that aimed for 5% reduction from 2017 on a per unit basis in the following areas: water consumption, waste disposal, electrical consumption, and natural gas consumption. Along with establishment of these reduction goals, reduction plans were developed, and monthly monitoring ensures our progress.

### **Implementation:**

The reduction plans are managed by various members of management and implemented in multiple areas around the BraunAbility campus. Environmental awareness among our employees through shop talks, newsletters, training sessions, and companywide announcements on our corporate video bulletin board continued in 2018.

Throughout 2018, we also made headway in our goal of achieving ISO 14001:2015 Certification through the implementation of an Environmental Management System.

### **Measurement of Outcomes:**

- Completed an Environmental Legal Compliance Audit and were found to be in compliance.
- Completed a Management Review of our Environmental Management System.
- Completed the Stage 2 Certification Audit for official ISO 14001:2015 Certification.
- Engaged with a new recycling partner to strengthen our recycling program.

## **Anti-Corruption**

### **Assessment, Policy, Goals:**

In the past year, BraunAbility developed a trade restrictions procedure that requires an initial search and annual review by BraunAbility of entities BraunAbility conducts business with to ensure good trade standing.

BraunAbility also has an anti-bribery and anti-corruption policy and procedure, in which BraunAbility commits to conducting business in compliance with all laws and regulations. This policy also requires reporting of gifts given and received by BraunAbility employees, the input of which is monitored by management, in addition to preclearance procedures when giving gifts or other items of value. This policy also addresses the Foreign Corrupt Practices Act and UK Bribery Act.

In 2018, BraunAbility also expanded its FCPA and UK Bribery Act training into its international joint venture in Brazil.

### **Implementation:**

A training session on our trade restrictions procedure was held for the appropriate employees in our sales department.

In addition, anti-corruption awareness was incorporated into key meetings of our sales department and educational posters on anti-corruption were periodically displayed throughout our campus.

Employee gift reports are reviewed by top management quarterly and a whistleblower reporting system is available to all employees.

A 45-minute online training on the FCPA and UK Bribery Act was implemented to appropriate employees in Brazil.

### **Measurement of Outcomes:**

- A trade restrictions review of our international customers list was conducted.
- Quarterly reporting and tracking of all gifts given and received.
- 23 employees at our Brazil subsidiary completed FCPA training.
- Two anti-bribery/corruption presentations were given to our internal sales department team members.