



Surgitrac Instruments UK Limited is committed to working with our suppliers to achieve high social and ethical standards within the business and throughout the supply chain. To achieve this, management have allocated the resources to ensure effective implementation of this goal.

POLICY

This policy has been sent to all suppliers and is publicly available on the company's website. www.surgitrac.com

Our Labour Standards Assurance Policy is reviewed on an annual basis and evidence is via document control. Surgitrac Instruments UK Limited also requires its suppliers to comply with their national laws along with the principles held within the Labour Standard Assurance System and the base code of the Ethical Trading Initiative.

Labour Standards Assurance Policy

Introduction

Surgitrac Instruments is committed to working with its suppliers to achieve high social and ethical standards within its business and throughout its supply chain. Management has allocated the resources to ensure the effective implementation of this Policy. In order to achieve and continually improve these high standards, we have developed an Ethical Trading Policy based on the internationally recognised ETI Base Code and will ensure that this is effectively implemented according to the Principles of Implementation below.

The ETI Base Code can be found here:

<http://www.ethicaltrade.org/sites/default/files/resources/ETI%20Base%20Code%2C%20English.pdf>

In order to ensure Surgitrac Instruments remains current with relevant legislation within its suppliers' country of origin it has subscribed to Social Accountability International and Business & Human Rights Resource Centre who provide newsfeeds regarding human rights, labour and anti-corruption legislation and all who seek to improve international labour conditions.

Surgitrac Instruments is committed to compliance of the NHS Supplier Code of Conduct and recognises that its responsibility for human rights and labour conditions encompasses its supply chain as well as direct business operations. Surgitrac Instruments is committed to working with its suppliers in order to help them improve human rights and working conditions to ensure internationally accepted labour standards are met throughout the supply chain.

This policy outlines the ethical standards required of all suppliers, contractors and sub-contractors. We understand that subcontracting may occur throughout the supply chain and require our suppliers to communicate in full the detail of where and under what circumstances sub-contracting is taking place.

Document: Labour Standards Policy	Issue No: 6
Date of Issue: 09/06/2021	Page: 1 of 6



This policy should be advertised internally on your notice board and made publicly available to all your staff. Employees can contact Surgitrac Instruments UK Ltd directly at stafffeedback@surgitrac.co.uk

Surgitrac Instruments requires written confirmation of acknowledgment from all suppliers within 2 weeks that the following standards will be met:

Employment of Appropriate Workers

The company will not make any use of forced labour, including prison labour (ILO Declaration on Fundamental Principles and Rights at Work, 1998). Workers are not required to lodge 'deposits' or their identity papers with their employer, and are free to leave their employer after reasonable notice.

Freedom Of Association & The Right to Collective Bargaining

All workers have the right to join or form trade unions of their own choosing, and are able to bargain collectively (International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, 1998).

The employer must recognise the principals and objectives of trade unions and their organisational activities.

Worker's representatives are not to be discriminated against and must be permitted access to perform their representative roles in the workplace.

Under legally restricted circumstances of collective bargaining and freedom of association the employer is to facilitate, not hinder the development of parallel means for independent and free association and negotiation.

Working Conditions

The company will provide a safe and hygienic work environment, and will take all reasonable steps to prevent accidents and injury to health in the work environment.

All workers shall receive regular and recorded health and safety training.

The company will provide access to clean toilet facilities and to potable water, and if appropriate, sanitary facilities for food storage shall be provided.

Accommodation where provided, shall be clean, safe and meet the basic needs of the workers.

Child Labour

The company will not employ workers under the legal minimum working age stipulated by the laws governing their country. Where young workers are employed (16-18), they will not work at night or in hazardous conditions (ILO Declaration on Fundamental Principles and Rights at Work, 1998).

Workers under the age of 18 must not work at night or under potentially hazardous conditions. Suppliers must have in place worker management systems for young workers

Living Wages Are Paid

Document: Labour Standards Policy	Issue No: 6
Date of Issue: 09/06/2021	Page: 2 of 6

Wages and benefits paid for a standard working week meet national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs, and to provide some discretionary income.

All workers are to be provided with written and understandable information about their employment conditions in respect to wages before they enter employment.

Deductions from wages as a disciplinary measure shall not be permitted, nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned.

Working Hours Are Not Excessive

Working hours comply with national laws and benchmark industry standards, whichever affords greater protection based on International Labour Standards.

Workers shall not on a regular basis be required to work excessive hours, and shall be provided with reasonable and adequate time off.

Overtime shall be voluntary, shall not be demanded on a regular basis, and shall always be compensated at a premium rate.

Freedom of Movement

Workers must be free to enter and exit the work premises, accommodation, or transport. All workers must have access to their own documents, i.e, passport, driving licence, ID card. Other than for legitimate reasons, workers must not have their movements controlled inside the workplace, through the use of surveillance cameras or guards, or outside the workplace by agents of their employer.

Emergency Response

The Company have identified aspects of the ETI Base Code that are of particular importance for meeting minimum levels of labour standards. If non-compliance of the ETI Base code is found, the Company will ask the Supplier for an emergency response which comprises a request for a written Corrective Action Plan highlighting any gaps in processes and root causes within 14 days. This will then be approved by all parties involved. Should this Corrective Action plan be deemed unacceptable then resourcing of production from within the Company's existing supplier base shall be implemented within 30 days of the initial breach of the above minimum labour standards.

Discrimination

The company shall not discriminate against any person based on race, caste, national origin, religion, age, gender, disability, marital status, sexual orientation, union membership or political affiliation (ILO Declaration on Fundamental Principles and Rights at Work, 1998).

Regular Employment Is Provided

To every extent possible, work performed must be on the basis of recognised employment

Document: Labour Standards Policy	Issue No: 6
Date of Issue: 09/06/2021	Page: 3 of 6

relationship established through national law and practice.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour only contracting, sub-contracting, or home working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

No Harsh or Inhumane Treatment is Allowed

Physical abuse or discipline, the threat of physical abuse, sexual abuse, verbal abuse or other forms of harassment or intimidation shall be prohibited.

All disciplinary measures should be recorded.

In order to drive compliance and assure effective implementation of this policy, and achieve continual improvement, Surgitrac Instruments commits to the following Principles of Implementation and will:

- Dedicate ownership of the Policy to a management representative (Steve Bourne) and dedicate operational responsibility to others where necessary.
- Adequately communicate the Policy both internally and externally, ensuring that all relevant employees suppliers and contractors are aware of the Policy and its Principles of Implementation.
- Recognise their suppliers' ethical and responsible sourcing policies where they are comparable to Surgitrac Instruments'.
- Provide appropriate training, capacity building, resource and guidance to support the implementation of this Policy.
- Require all suppliers to confirm in writing that they have received, understood and are working towards compliance with the Policy.
- Require suppliers to disseminate the LSAS Policy through their own supply chain, requesting and returning to Surgitrac Instruments signed acknowledgment from those who constitute Surgitrac Instruments' suppliers for the framework.
- Require all suppliers to report their level of compliance to this Policy through the return of self-assessment questionnaires (SAQs)
- Regularly review their suppliers' commitment to supporting the Policy through periodic communication and assessment.
- Maintain an internal system to record and monitor the level of compliance to this Policy.
- Cease trading with suppliers demonstrating persistent disregard for the Policy, considering the impact this may have on the workers and communities in which the supplier operates.

NON - COMPLIANCE

By entering into an agreement with Surgitrac Instruments, Suppliers hereby agree to and accept the terms of this Code, and report any suspected incidence within 7 days.

Without prejudice to the provisions of the Code or the terms of any agreement between Supplier and Surgitrac Instruments, Surgitrac Instruments shall be entitled in its sole and absolute discretion to terminate all contracts with Suppliers with immediate effect and without liability in the event that:

Document: Labour Standards Policy	Issue No: 6
Date of Issue: 09/06/2021	Page: 4 of 6



- Suppliers are not being fully compliant with the Core Requirements at any time.
- If, in the reasonable determination of Surgitrac Instruments, Suppliers shall have failed to demonstrate to the satisfaction of Surgitrac Instruments a genuine willingness to work towards meeting all of the provisions of the Code within a reasonable time.
- If, in the reasonable opinion of Surgitrac Instruments, Suppliers shall have failed to demonstrate to the satisfaction of Surgitrac Instruments, sufficient openness and transparency to allow a robust verification of their working practices.

In the event that Surgitrac Instruments considers that a Supplier is not in compliance with the Core Requirements or the wider provisions of this Code, the Supplier must take all such appropriate remedial actions as requested by Surgitrac Instruments to address any areas of concern

Measurable targets have been set by Surgitrac Instruments to ensure our objectives have been met in relation to LSAS.

Surgitrac Instruments is committed to continual improvement of the Labour Standards Assurance System. Any suggestions for improvement can be submitted to Steve Bourne, steve.bourne@surgitrac.com

Please do not hesitate to contact Steve Bourne on 00 44 (0)161 776 7612 steve.bourne@surgitrac.com if you have any questions or concerns regarding labour standards, or a non-compliance issue.

Please sign and date below and return to Steve Bourne at Steve.Bourne@surgitrac.com within 2 weeks of receipt of this document.

Approved by:



Steve Bourne
Group Business Development Director

I of (Supplier to Surgitrac Instruments UK Ltd) hereby sign and return this policy to confirm that I have read and agreed to the policy.

Sign:

Date:

Document: Labour Standards Policy	Issue No: 6
Date of Issue: 09/06/2021	Page: 5 of 6

Date of review	Reviewed by	Date of next review
30/09/2015	P. Chad	30/12/2015
4/1/2016	P.Chad	1/3/2018
01/09/2016	S. Bourne	01/03/2017
11/7/17	S. Bourne	11/7/18
10/1/18	S. Bourne	10/1/19
18/09/2018	S. Bourne	18/09/2019
18/09/2019	S.Bourne	18/09/2020
06/01/2020	S. Bourne	06/01/2021
06/01/2021	S. Bourne	06/01/2022
09/06/2021	S.Bourne	09/06/2022
14/6/2022	S. Bourne	13/06/2023