

WR100 - Labour Standards Assurance System Policy

Sirane Ltd manufactures and supplies a range of absorbent and disposable medical devices. These products include: - Absorbent theatre mats, Tourniquet drapes and absorbent disposable pouches.

Resulting from its business operations, the Company acknowledges its obligations towards its customers, employees and the communities in which it works, and has decided to document its policy in relation to labour standards and for this document to be approved by senior management; specifically, by **Simon Balderson - Managing Director**.

The company acknowledges its obligations towards customers, employees and communities in which it works and the responsibilities it encourages all parties involved in each of the stages in producing our products. To achieve these aims Sirane has developed an Ethical Trading Policy based on the internationally recognised ETI Base Code.

Sirane can confirm that this policy is relevant throughout the organisation, subcontractors and suppliers.

SCOPE OF POLICY

Sirane Ltd. has applied this policy in order to supply into the NHS via the following framework agreement: NHS-SC Framework Agreement for Absorbent Theatre Mats; These products are: - **Absorbent cellulosic material laminated to a low slip Co-Ex HD/HD/VLDPE film.**

COMMUNICATION

This policy has been communicated to all employees on 24/04/2017. Furthermore, new employees will agree to our ethical standards are made aware of our procedures on the subject as part of their initial induction. In addition, all key suppliers and contractors that work with Sirane Ltd. have been sent a copy of this policy to review on 12/06/2018. All suppliers and contractors have agreed to the standards upheld by Sirane. All records are kept on file for review.

COMMITMENT

In order to ensure Sirane Ltd remains current with relevant legislation within its supplier's 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.

Sirane Ltd will review and maintain this policy on annual basis to ensure compliance with LSAS.

Sirane Ltd 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. Sirane Ltd is committed to working with its suppliers 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.

Sirane Ltd requires written confirmation of acknowledgment from all suppliers 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

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.

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 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, Sirane commit to the following Principles of Implementation and will:

- ❖ Dedicate ownership of the Policy to a management representative (Alan Stanworth) 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 Sirane's.
- ❖ 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 Sirane Ltd signed acknowledgment from those who constitute Sirane's 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.

Whistleblowing (Public Interest Disclosure Act 1998)

The main purpose of the system is to provide you with ready access to a safe and effective means of reporting any matters which fall within the 'qualifying disclosures' below, regarding the Company and/or its employees and workers.

Should you discover a situation which falls within one of the qualifying disclosures below, you are free to decide to whom you should report the matter, in terms of their seniority/position within the Company.

Qualifying disclosures - If an employee is to be protected, the disclosure must be one covered by the Public Interest Disclosure Act 1998. A qualifying disclosure is a disclosure which, in the reasonable belief of the employee tends to show one or more of the following:

- ❖ That a criminal offence has been committed, is being committed, or is likely to be committed.
- ❖ That a person has failed, is failing, or is likely to fail to comply with a particular legal obligation.
- ❖ That a miscarriage of justice has occurred, is occurring, or is likely to occur.
- ❖ That the health or safety of any individual has been, is being, or is likely to be endangered.
- ❖ That the environment has been, is being, or is likely to be damaged.
- ❖ That bribery has been committed, is being committed, or is likely to be committed.
- ❖ That information indicating the occurrence of any of the above has been, is being, or is likely to be deliberately concealed.

The Company will support employees and any non-workers who make confidential disclosures and protect them from reprisals or victimisation as long as the employee makes the disclosure with reasonable belief and falls within one of the above qualifying disclosures. This also applies where the employee or non-employee make the disclosure with reasonable belief and falls within one of the above qualifying disclosures, but which turns out later not to have been justified.

This policy should not be used for a complaint relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should follow the Company's grievance procedure.

It is acknowledged, that it is never easy to report a concern, particularly one which may relate to an unlawful act. However, you are urged to come forward with any concerns, at the earliest opportunity, so that matters can be dealt with promptly and effectively.

In the first instance, you may wish to discuss the matter, on an informal basis with your Line Manager if an employee or with a Senior Manager if a non-employee; preferably the

Managing Director – Mr Simon Balderson / Simon.balderson@sirane.com / 07971 492696

or the

Human Resources Manager – Mr Alan Stanworth / Alan.stanworth@sirane.com / 07817 201421

NON - COMPLIANCE

By entering into an agreement with Sirane Ltd, Suppliers hereby agree to and accept the terms of this Code.

Without prejudice to the provisions of the Code or the terms of any agreement between Supplier and Sirane Ltd, Sirane Ltd 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:

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

In the event that Sirane Ltd 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 Sirane Ltd to address any areas of concern

RESOURCES

Adequate and sufficient resources will be made available to the LSAS requirements. This will equate to time and financial backing to the standard.

AVAILABILITY

This policy and relevant parts to this manual are available on the company's website: <http://www.sirane.com/>.

For further information please refer to the company hand book. *WR280 – Company Handbook*

Approved by: Simon Balderson (Managing Director)

I Of (company name)
hereby sign and return this policy to confirm that I have read and agreed to the above policy.

Signed:

Date: