

A C Cossor & Son (Surgical) Ltd Ethical Trading Policy

1. Introduction

We recognise the responsibility that we share with our suppliers to source products in an ethical manner. We want our customers to be confident that the people who make our products are treated fairly, are not exploited and are not exposed to unsafe working conditions.

This Ethical Trading Policy (ETP) is a core element of our commitment to buy and sell our products responsibly. All our suppliers are expected to comply with this policy which ensures key rights for workers. It is based on the Fundamental Conventions of the International Labour Organisation (ILO) and National and International Laws.

Our ETP is referenced in our Supplier Approval Procedure and is one of the Policies written into our employee contracts of employment.

We expect all our suppliers to have ethical processes and policies in place throughout their supply chain

We will monitor supplier compliance with this policy through a range of systems to support the risk management, continuous improvement and capacity building of our suppliers, including the requirement for suppliers to provide reasonable information as evidence of compliance to our ETP.

2. Scope

This policy applies to all suppliers to A C Cossor & Son (Surgical) Ltd and is applicable to the supply of goods for resale and goods and /or services not for resale and for repair.

3. Implementation Principles

Commitment to Ethical Trading

Our ETP is integrated into our commercial and supplier management activities and our commitment to Ethical Trading forms a key part of our Corporate Responsibility programme. We recognise the need to communicate our commitment to key stakeholders including our suppliers and the people who work for our suppliers. We seek to develop long-term relationships with our suppliers who share our ethical standards. These relationships with suppliers are based on the principle of fair, open and honest dealings at all times. Only suppliers that share our standards and can demonstrate compliance will be considered appropriate to trade with A C Cossor & Son (Surgical) Ltd

Monitoring & Assessing Risk

We assess all our suppliers through our robust risk-based systems and then monitor them accordingly. Our assessment tools determine the level of ethical risk posed by each supplier, with the highest risk supplier sites being required to regularly demonstrate compliance and to ensure any non-compliances are addressed within the timescales appropriate to the criticality. Through active monitoring we will measure the performance of our Suppliers against our ETP and identify emerging trends.

Improvement

We encourage and support continuous improvement in supplier standards and we regularly measure supplier improvement. We recognise our suppliers may need time and support to ensure compliance, however, all our suppliers must demonstrate that any breach of our ETP is addressed in timescales appropriate to the criticality. Where we are alerted to breaches of our ETP we will take action that we consider appropriate. We will work with suppliers to resolve ethical trading issues. If suppliers are unable or unwilling to address critical issues associated with any breach of our ETP within the required timescales, this will be considered a material breach and we reserve our right to terminate the relationship in accordance with our contractual rights.

Transparency

We will strive to be open and honest when we work with others and ensure reporting is fair and transparent.

Capacity Building

We are committed to providing guidance, support and training for our colleagues and suppliers to identify and resolve ethical issues.

4. Specific Supplier Requirements

The requirements outlined in this section are in addition to all applicable legislation and industry practice. These requirements are in addition to our standard requirements for products supplied to be safe, legal and good quality.

All suppliers are required to comply in all respects with our ETP which is referenced in our Supplier Approval documentation.

5. A C Cossor & Son (Surgical) Ltd Ethical Trading Policy (ETP)

The requirements of the A C Cossor & Son (Surgical) Ltd ETP constitute minimum and not maximum standards.

Suppliers shall at all times comply with this policy and with all applicable national and international laws, regulations, codes and standards, both in the country in which the supplier works, and in the country in which the product and/or services are sourced/provided.

Suppliers shall ensure, as far as is reasonably practicable, that their suppliers, agent(s), subcontractors and consultants, who are directly or indirectly involved in the provisions of goods and /or services to A C Cossor & Son (Surgical) Ltd comply with this policy.

Suppliers shall ensure that:

1. Employment is freely chosen.

There is no forced, bonded or involuntary prison labour. Workers are not required to lodge monetary deposits or their identity papers with their employer and are free to leave their employment after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

Workers have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

Workers' representatives are not discriminated against and have access to carry out their representative functions in the work place. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates and does not hinder the development of parallel means for independent and free association.

3. Working conditions are safe and hygienic

A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising so far as is reasonably practicable the causes of hazards inherent in the working environments. Workers shall receive regular and recorded health and safety training. Workers are provided with access to clean toilet facilities and to potable water, and, if appropriate sanitary facilities for food storage shall be provided.

A senior management representative shall be responsible for Health & Safety.

4. Child labour shall not be used

There shall be no use of child labour. In the event of any child found to be performing child labour, they shall be removed from the workplace immediately. The supplier shall then participate and contribute to the provision for the transition of the child to enable her or him to attend quality education until no longer a child.

Young persons under 18 shall not be employed at night or in hazardous conditions. These policies and procedures relating to Child Labour shall conform to the provisions of the relevant International Labour Organisation (ILO) Standards.

5. Remuneration

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

All workers shall be provided with written and understandable information about their employment conditions including information with respect to wages before they enter employment, and about the particulars of their wages for the pay period concerned each time they are paid. 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. All disciplinary measures should be recorded.

6. Working hours are not excessive

Working hours must comply with national laws, collective agreements, and the provisions defined in the clauses below, whichever affords the greater protection for workers. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week *

All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by the clause below.

Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:

- This is allowed by national law;
- This is allowed by a collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce;
- Appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.

*International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

7. No discrimination is practised

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

To every extent possible work performed must be on the basis of recognised employment relationships 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 and 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.

9. No harsh or inhumane treatment is allowed

Suppliers provide a workplace in which any form of harassment is unacceptable. Examples include Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidations.

10. Entitlement to work

Only workers with a legal right to work in the country should be employed. For both workers and agency workers, original documents should be reviewed and then returned to workers to verify right to work.

11. Labour Providers

Labour providers should only supply workers registered with them. Relationships with Labour providers should be covered by a Service Level Agreement which meets all national legal requirements. Labour providers should be independently audited on a regular basis to ensure compliance with national requirements/legislation.

Definitions

Child: Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply.

Young Person: Any worker over the age of a child as defined above and under the age of 18.

Child Labour: Any work by a child younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.

ILO: International Labour Organisation

ETP: Ethical Trading Policy

Hazardous Conditions:

The following are examples of hazardous work according to the ILO:

- Work which exposes children to physical, psychological, or sexual abuse
- Work underground, underwater, at dangerous heights, or in confined spaces
- Work with dangerous machinery, equipment, and tools, or which involves the manual handling or transport of heavy loads
- Work in an unhealthy environment which may, for example, expose children to hazardous substances, agents, or processes, or to temperatures, noise levels, or vibrations, damaging to their health
- Work under particularly difficult conditions such as work for long hours or during the night or work where the child is unreasonably confined to the premises of the employer