


Approval

Function	Name	Signature	Date
Quality	Sue Maude		11 June 2021

Change History

Revision	Supersedes	Summary of Change
8	7	Change Control 2020-296 applies Reference to modern slavery added section 6 minimum labour standards Section 5 company objectives updated
9	8	Change Control 2021-119 applies: Section 5 update to target dates following easing of COVID-19 restrictions Section 7 update to job title for Neil Mercer and removal of Anthony Weston Section 7 update to email address'

1. Introduction

Network Medical Products manufactures and supplies a range of Ophthalmic and ENT medical devices throughout the world.

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 the CEO.

Network Medical Product's Management define this policy as relevant to the organisation itself, its contractors, sub-contractors, suppliers and other parties engaged through the supply chain.

2. Scope of Policy

In the first instance, Network Medical Products is applying this policy to the products it anticipates will sell within the UK. This policy covers all sections of the Labour Standards Assurance System sections 1-15 as defined by the NHS, these include, Labour Standards Policy, Management Representation, Status Review, Legal Requirements, Objectives, Roles and Responsibilities, Training, Communication, Documentation, Operational Control, Supply Chain Management, Emergency Response, Performance Measurement, Corrective Action and Management Review.

3. Nature and Scale

The Company seeks to implement a policy which is appropriate in nature and scale to the Company and in line with its status, as defined by EU law, as an SME.

4. Continual Improvement

The Company commits to periodically review this policy in order to continually improve, taking into consideration changes in legislation and any other requirements to which the Company subscribes. This will allow us to ensure the adequacy, suitability and continuing effectiveness of the policy. Specifically, the policy will be routinely reviewed at the Company's Management Review Meetings and will be integrated into its QMS.

5. Company Objectives

The company commits to the following objectives.

Objective	Owner	Target Date
1. To maintain Level 3 for the Suction Tube NHS Framework	SM	End Aug 2021
2. To review LSAS performance, policy and objectives at least annually	SM	End Jan 2021
3. To improve second tier supply awareness via completion and of LSAS supplier questionnaires and acknowledgement of LSAS Policy	CW	End Dec 2021
4. To ensure LSAS management review takes place at least annually	SM/CW	End Jun 2021
5. To ensure relevant employment and human rights legislation is actively assessed via NATLEX and any impact to the supply chain actioned	CW	Monthly
6. As part of ongoing personal development LSAS stake holder and representatives to complete / attend at least 1 Ethical Trade training	SM/CW	Annually

6. Minimum Labour Standards

The Company has identified the following compelling reasons to establish a comprehensive system of Minimum Labour Standards to guide it in its business operations.

1. ETHICAL RESPONSIBILITIES

The Company acknowledges its obligations towards its customers, employees and the communities in which it works arising from its business operations and wishes to work and trade in an ethical fashion.

2. THREAT TO SECURITY OF SUPPLY

The Company has identified that labour standards abuses in the supply chain can pose a risk to the security of supply. Any supply chain partners perpetrating abuses face legal enforcement action which may damage business and interfere with their ability to continue to supply.

3. ADVERSE PUBLICITY AND DAMAGE TO THE COMPANY'S REPUTATION

Adverse publicity from the discovery of labour standards abuses in the Company's supply chain presents reputational and structural risks as follows –

(a) Income

Customers may choose to purchase supplies and services from other providers

(b) Staff recruitment and retention –

Staff may choose not to work for a Company associated with any labour standards abuses and this may lead to poor morale in the work place and difficulty in recruitment

(c) Loss of trust –

both with customers and suppliers as well as within the wider community.

4. REDUCED QUALITY OF GOODS AND SERVICES

The Company recognises that there is commonly a link between poor labour standards and poor quality of goods and services. To this end, it is in the interest of the Company to ensure its suppliers reach minimum labour standards targets at all times. To help it identify a defined set of minimum labour standards, the Company has particularly referred to the following resources: -

These minimum labour standards are: -

- **Child Labour**

The Company does not engage in or support the use of child labour. If the company engages any young workers (e.g.: on work experience), it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions, or in any case never work more than 8 hours per day.

- **Modern Slavery, Human Trafficking and Forced & Compulsory Labour**

The Company shall not engage in, or support the use of slavery, trafficked, forced or compulsory labour or bonded or involuntary prison labour. Employees are free to leave upon reasonable notice.

- **Health & Safety**

The Company shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to employees' health by minimizing, so far as is reasonably practicable, and in co-operation with its employees, the causes of hazards inherent in the workplace. All employees will receive safety and job specific instructions during the course of their employment with the company.

Employees shall have access to clean sanitary facilities and drinking water.

Responsibility for implementing the Health & Safety element of this policy is assigned to the Finance Director.

- **Freedom of Association**

The freedom of association is respected, and the Company will comply with UK labour relations legislation in this regard.

- **Discrimination**

The Company shall not engage in or support any discriminatory practices in hiring, remuneration, access to training, promotion, termination or retirement based on race, national or social origin, caste, religion, gender, sexual orientation, political affiliations, age or other conditions that could give rise to discrimination. The Company has an Equal Opportunities and Diversity Policy which is shown to all new employees at induction.

- **Disciplinary Practices**

The Company shall treat all employees with dignity and respect. The Company shall not engage in, or tolerate the use of, corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is allowed.

- **Working Hours**

The Company shall comply with applicable laws and industry standards on working hours and holiday entitlements. The Company's normal working hours do not exceed 48 hours per week and overtime hours do not exceed 12 hours per week. The Company ensures all employees have the legal right to be employed in the UK.

- **Remuneration**

The Company shall comply with national laws and regulations with regard to wages and benefits. All work-related activities are carried out on the basis of a recognised employment relationship established according to national law and practice.

7. LSAS Concerns

The Company encourages all employees, workers, contractors, customers and other business partners to report any concerns related to the direct activities or the supply chains of the Company. This includes any circumstances that may give rise to unethical behaviour of any kind.

The company operates a **confidential** Whistleblowing policy in conjunction with Peninsula.

To raise a concern contact: -

- Neil Mercer (Vice President) nmerc@innoviamedical.com
- Carol Hill (HR Business Partner) chill@innoviamedical.com
- Peninsula Employee Assistance 0800 0474097
- Alert Email Riponlsasalert@innoviamedical.com

State that you are using the Whistleblowing Policy. Appropriate steps will be taken to ensure that your working environment and/or working relationship is/are not prejudiced by the fact of your disclosure.

Where possible, the following information should be provided:

- An outline of the known or suspected wrongdoing.
- Details, to the best of your knowledge, about when, where and how it occurred.
- A list of the names of those suspected of being involved (both within the Company and externally).
- A list of the names of anyone who may have relevant information.
- Details of how you came to know about the suspected activities.
- What, if any, breaches of internal controls, policy, procedure or other requirements you believe took place.
- The names of anyone who you have discussed or reported this incident to.
- Your name and contact details. Please note that these will be kept confidential as far as is reasonably practicable.

8. Company Commitment

The company commits itself to monitoring and maintaining the labour standards within the company's supply chain through the distribution and communication of this policy along with the ongoing assessment of whether these standards are being met. This will occur at various control points.

The company commits to maintaining a database of all suppliers.

New Suppliers of product must meet the company's initial approval which outlines the standards to which the supplier is expected to maintain as part of their contract. These standards comply fully with those required by LSAS.

Reviews will be undertaken at least annually as part of supplier appraisal and during routine visits to suppliers and audits to ensure they continue to comply fully with the LSAS.

The Company also commits to: -

Compliance with relevant legal and other requirements to which it subscribes.

Ensure that all its key contractors, sub-contractors and suppliers are aware of this policy.

Signed:

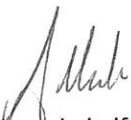


Neil Mercer on behalf of Network Medical Products Ltd
Vice President

Date:

10/06/2021.

Signed:



Sue Maude on behalf of Network Medical Products Ltd
Quality Manager
(LSAS Representative)

Date:

11 June 2021



Labour Standards Assurance System (LSAS Policy)

REF/ ID No. QP-LS-001

Issue. 9

Pages. 5 of 5

Attachment 1

QP-LS-001-FI Acknowledgment of LSAS policy form

This is to certify that on behalf of the company set forth below we hereby acknowledge that we have fully read and understand the content of Network Medical Product Ltd Labour Standards Assurance (LSAS) policy.

Print supplier name and address:

Signature

Print Name

Title

Date
