

## ETHICAL/LABOUR STANDARDS POLICY

Mediplus is committed to upholding an ethical labour policy in line with its legal and moral obligations. The standards are maintained within the Company and the Suppliers within the Company's supply chain.

These ethical standards cover:

- Child labour
- Forced or compulsory labour
- Freedom of association and right to collective bargaining
- Discrimination
- Health and safety
- Working hours
- Remuneration
- Anti-slavery

As part of our commitment to quality and our ISO 13485 standards we continually assess and monitor our own performance and process controls and also those of our suppliers. Our aim is to ensure that standards are continuously improving.

The Mediplus Group commits to making available sufficient resources for the implementation of this policy.

### 1. Introduction

As a manufacturer of Medical Devices, the Mediplus Group of companies recognise our obligation to provide our customers with high quality, professional goods and services at a competitive price whilst ensuring that at no point is any person in any part of the supply chain exploited or treated in a way that breaks relevant employment legislation. We are fully aware of the responsibilities we bear to all parties involved in each of the stages involved in producing our products and have developed this policy to outline the standards that we and, ultimately, all stakeholders involved with the business should seek to adhere to. Mediplus shall show a preference, where appropriate, to suppliers with higher labour standards.

### 2. Aims

The aim of this policy is to promote understanding and awareness of employment laws and ethical standards. By detailing our labour standards to all parts of our supply chain we hope to develop better ethical standards by motivating our suppliers to adhere to it. It also describes the standard required of potential future suppliers. Mediplus Labour Standards objectives are as follows:

- To become a progressive ethical company and comply with the ETI Base Code
- All suppliers should have full compliance with the ETI Base Code as soon as possible
- To encourage parties in our supply chain to develop their own labour standards system and provide help and support to allow them to do this



### 3. Anti-Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners.

This applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

We encourage openness and support anyone who raises genuine concerns in good faith about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. They should notify their Line Manager or a Director as soon as possible if they believe or suspect that modern slavery has occurred or may occur in the future. We will support anyone who raises such concerns even if they are unsure or turn out to be mistaken.

Where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

### 4. Policy Statement

Mediplus policy in relation to labour standards and anti-slavery as relevant to the organisation itself, contractors, sub-contractors, suppliers, and any other parties engaged through the supply chain is as follows:

- We shall comply to all Employment Laws relevant to our business
- We comply to the Health & Safety Act 1974 – as outlined by the Employee Handbook
- We comply with all other Employment Legislation – as outlined by the Employee Handbook
- We will work towards the ETI Base Code, demonstrating compliance with the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with international, national and local law and practice
- We will meet our obligations under the Modern Slavery Act 2015
- We shall encourage all suppliers and contractors to adhere to the Ethical Trading Initiative as part of the respective contracts



#### 4.1. Management Representative

The management representative assigned the responsibility of implementing an effective Labour Standard Assurance System (LSAS) is Emma Gray. The responsibilities of the Management Representative are as follows:

- To develop procedures to meet policy requirements
- To communicate labour standards issues to senior management
- To liaise with companies in the supply chain to undertake labour standard status reviews
- To set objectives and targets for labour standards assurance with plans for training, auditing and required action
- To liaise with companies in the supply chain to implement a plan of action to meet objectives
- To regularly review and improve the Labour Standards policy
- To implement training for staff involved with the LSAS

#### 4.2. Roles and Responsibilities

Given the size of the company and the number of companies in the supply chain, it is adequate for the Management Representative to undertake the main responsibility of the LSAS. Members of staff involved with the LSAS shall be identified using the training records system and skills matrix. Resources relating to the LSAS will be available to all involved staff.

#### 4.3. Labour Standards Review Status

Mediplus commit to undertaking a comprehensive Labour Standards Review. This occurs when contracting a new supplier, during regular routine visits and when questionnaires are sent to suppliers. This is to ensure that labour standards throughout our supply chain are satisfactory and continually improving. Relevant national requirements and conditions applying to suppliers are regularly reviewed and used to identify any changes which could affect the labour standards risk. We recognise that if a supplier were found to be using unethical or illegal labour programmes, this would have a profound impact on the reputation and integrity of the Company.

#### 4.4. Legal Requirements

Mediplus commit to remain up to date with changes to relevant employment legislation. Relevant employment legislation with regards to Mediplus direct operations is outlined in the Employee Handbook and is signed by all employees once read and understood.

#### 4.5. Competence, Training and Awareness

Mediplus commit to the training of relevant staff in order to be competent with handling the labour standards programme. Relevant members of staff are those involved in procurement and new product development. Persons involved with the LSAS should:

- Have a good understanding of how Mediplus operates with knowledge of the supply chain
- Be in a position to contact suppliers and build a relationship with them
- Be trained in the LSAS requirements



Additionally, all Mediplus staff are made aware of the company's commitment to upholding an ethical labour policy through training.

#### 4.6. Communications

##### *Internal Communication*

Mediplus commit to ensuring that all staff are aware of the company's commitment to upholding an ethical labour policy. This is achieved through the following:

- Training – All Mediplus staff receive training detailing the companies ethical labour policy.
- Using an ethical labour standards policy which is available and easily accessible to all staff – a copy is given with their employee handbook, a paper copy is available in a public area, and it is published on the Mediplus Website.

##### *External Communication*

Mediplus communicates details of its labour standards assurance practices externally by publishing the ethical labour policy on the website. A hard copy is available to staff on request.

##### *Whistleblowing*

Any individual - internal or external – is able to raise concerns, complaints or questions about any issue relevant to ethical or labour standards occurring anywhere in the Mediplus supply chain in confidence by emailing [whistleblowing@mediplus.co.uk](mailto:whistleblowing@mediplus.co.uk).

#### 4.7. Documentation and Records

Documentation and records in relation to the LSAS shall be kept using standard document and record keeping procedures in line with other Quality documents.

#### 4.8. Operational Control

For the direct operation of the company, the Employee Handbook documents the procedures involved with controlling the labour standards of the company and addressing any risks or breaches of this policy that may be posed. The senior management of Mediplus have identified two critical control points for labour standards in the supply chain; Supplier Approval and Supplier Visits.

#### 4.9. Supply Chain Management

Mediplus commit to monitoring and maintaining the labour standards in the Company's labour standards policies along with conducting ongoing assessment of whether these standards are being met. This will take place using assessments at the control points stipulated in Section 4.8. New suppliers must meet Mediplus' initial approval that outlines the standards which the supplier is expected to maintain as part of their contract. These standards comply fully with those required by the LSAS. Reviews shall be taken at routine visits to suppliers to ensure they continue to comply fully with the LSAS.



#### 4.10. Emergency Response

Mediplus have identified aspects of the ETI Base Code that are of particular importance for meeting minimum levels of labour standards. Sections 1.1, 1.2, 4.1 and 9.1 are regarded by Senior Management of Mediplus as statements that justify emergency response. Emergency response comprises a request for a written Corrective Action Plan within 14 days that is approved by all parties involved. Should this Corrective Action Plan be deemed unacceptable then resourcing of production from within Mediplus' existing supplier base shall be implemented within 30 days of the initial breach of the above minimum labour standards.

#### 4.11. Performance Monitoring and Measurement

Mediplus commit to monitoring the performance of the LSAS during the Mediplus Quality Management Review meetings as part of resource management, assessing the progress of the programme and setting relevant targets, in addition to those stipulated in this policy, to ensure the progression of the LSAS against our objectives. Progression of parties in the supply chain shall be measured against the level of compliance with the ETI Base Code. Additionally two LSAS review meetings are held annually, where objectives and targets are set and monitored.

#### 4.12. Corrective Action

The existing processes for managing and closing corrective action in the Mediplus Quality Management System will be used for any non-conformities or potential non-conformities relating to ethical labour standards, unless the corrective action is in response to a an emergency as set out in 4.10. In this case a written Corrective Action Plan should be agreed by all parties within 14 days of the breach.

#### 4.13. Management Review

Senior management will formally review the labour standards programme during the Mediplus Quality Management Review meetings.



Emma Gray  
Managing Director

July 2021




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Final Audit Report


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