

## **Labour Standards Policy**

### **Purpose**

Anser Medical Ltd recognises the importance of corporate responsibility towards sustainable objectives and of maintaining high standards of social, ethical, and environmental conduct. We acknowledge and endorse the UN Global Compact by way of incorporating the Ethical Trade Initiative Base Code on which this is largely based, a standard for responsible business practice covering human rights, labour rights, the environment and anti-corruption. As providers of a range of products to the UK Healthcare market we are committed to ensuring that our supply chain partners and contractors throughout the supply chain adopt a similar approach. Our Code of Conduct has been devised with the aim of ensuring all supply chain partners adhere to the codes of conduct within it or are actively working towards their adoption.

### **Scope**

The scope of application of this system is for the provision of medical devices within the UK healthcare sector.

### **Authority & Responsibilities**

Managing Director has responsibility for ensuring that this policy is adhered to across the organisation.

### **Application of the Code**

The provisions of this Code constitute minimum and not maximum standards. It should not be used to prevent companies from exceeding these standards.

Companies applying this Code are expected to comply with national, local, and other applicable laws.

Where the provisions of law and this code address the same subject, the provision which affords the greater protection should be applied.

Workers are defined as those employed on a temporary or permanent basis, as well as workers that are employed either directly or indirectly.

Suppliers are expected to have noted the requirements and to have established similar arrangements or provide evidence that they are working towards the requirements.

### **Laws and Ethical Standards**

The Code is taken from the Ethical Trading Initiative (ETI) Base Code, which is in turn founded on the conventions of the International Labour Organisation (ILO).

The supplier shall comply with all laws applicable to its business locally & nationally. The supplier should adhere to the principles of the United Nations' Global Compact, UN Declaration of Human Rights as well as the 1998 International Labour Organisation's "Declaration on Fundamental Principles and Rights at Work" in accordance with national law and practice.

The supplier shall ensure conformance to all laws applicable in their nation and locality.

## **Anser Medical Ltd – Base Code**

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

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

Workers, without distinction, 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.

Worker's representatives are not discriminated against and have access to carry out their representative functions in the workplace.

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 and bargaining.

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 environment.

Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

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.

The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used.

There shall be no new recruitment of child labour.

Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.

Children and young persons under 18 shall not be employed at night or in hazardous conditions.

These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid.

Wages and benefits paid for a standard working week meet, at a minimum, 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 shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that 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

6.1 Working hours comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. International standards recommend the progressive reduction of normal hours of work, when appropriate, 40 hours per week, without any reduction in workers' wages as hours are reduced.

6.3 All overtime should be voluntary. Overtime shall be used responsibly, considering all the following: the extent, frequency and hours worked by individual workers and the workforce. 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.

6.4 The total hours worked in any seven-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation 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

6.6 Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

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 based on 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 using labour-only contracting, subcontracting, 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.

9. No harsh or inhumane treatment is allowed

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

Reviewed and verified by:	<b>Managing Director</b>
Date:	<b>17<sup>th</sup> April 2023</b>