



Accrington Surgical Instrument Suppliers Ltd

ETHICAL POLICY for Accrington Surgical Instrument Suppliers Limited

Accrington Surgical Instruments Suppliers Limited (ASISL) understands the challenge of ensuring a high standard of social and ethical standards within its business and throughout its supply chain. It is committed to working collaboratively with its suppliers to ensure these standards are achieved & are always improving.

ASISL has developed the Ethical Policy based on the ETI Base Code to apply to all its employment policies. The Ethical Policy will help to define ASISL's minimum standards and the basic requirements that we expect from all of our suppliers. ASISL are fully committed to ensure that these standards are properly implemented/measured/monitored.

Ethical Policy:

1. Employment is freely chosen

(1.1) There is no forced, bonded or involuntary prison labour.

(1.2) Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after a reasonable notice.

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

(2.1) Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

(2.2) The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

(2.3) Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

(2.4) 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

(3.1) 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.

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

(3.3) Access to clean toilet facilities and to water, and, if appropriate, sanitary facilities for food storage shall be provided.

(3.4) Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

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

4. Child labour shall not be used

(4.1) There shall be no new recruitment of child labour.

(4.2) 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.

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

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

5. Living wages are paid

(5.1) 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.

(5.2) 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.

(5.3) 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 must comply with national laws and benchmark industry standards, whichever affords greater protection.

(6.2) In any event, workers shall not, on a regular basis, be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day week period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

7. No discrimination is practised

(7.1) 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

(8.1) To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

(8.2) 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.

9. No harsh or inhumane treatment is allowed

(9.1) Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

(9.2) All disciplinary actions must be recorded and be fair, proportionate and fully compliant with local laws.

(9.3) Suppliers will ensure access to confidential means of reporting inhumane treatment and workplace grievances.



Code of Conduct of the Ethical Policy

ASISL is committed to developing partnerships with suppliers who share the same common principles of fair and honest trading.

ASISL is committed to not only complying with this policy within its own business, but to working collectively with its suppliers as well. ASISL will support our suppliers in achieving this objective and will abide by the following principles in order to achieve a continuous improvement in our ethical performance.

ASISL is also committed to ensuring that the products it receives, are only obtained from suppliers who maintain satisfactory working conditions and, at a minimum, comply fully with all legal requirements and the labour, health and safety standards of those countries in which the processes of those products will take place.

ASISL seeks to uphold the following standards in dealing with suppliers:

- Terms and Conditions must be compatible, fair and honest trading practises and have a regard for the welfare of individuals.
- Must be opposed to the exploitation of children.
- Must support a fair & reasonable reward for workers.
- Must be opposed to discrimination in all forms.

ASISL reserves the right to assess its suppliers to ensure that the required standards are being met.

ASISL will only trade with those suppliers who have/or are working towards compliance of the code and will work with its suppliers in order for these codes to be achieved and maintained.

Principles of the code

- No forced, bonded or involuntary labour.
- Workers shall be free to leave after a reasonable notice and receive reasonable notice in the event of a termination.
- No worker must be subjected to harassment (sexual or otherwise) nor must they be subjected to other forms of intimidation.
- Disciplinary processes must comply with local law as a minimum and be clearly defined and communicated to all workers. Action taken must be duly recorded.
- Grievance procedures must allow all workers to raise concerns with their employer about their employment conditions without fear of reprisal.
- Freedom of workers to associate with any trade union.



Accrington Surgical

- All part time/temporary/fixd term contracts or home working arrangements shall not be used to avoid compliance with the code.
- All workers must be allowed at least one day off in a seven day week period.

Wages and Benefits

- Wages and benefits must as a minimum meet the local minimum wage criteria. Where no such criteria exists, wages and benefits must be in accordance to allow at least for the provision of basic needs and some discretionary income.
- Where minimum wage exists, full time workers must receive at least amount of money in their basic hours.
- All workers will be provided with written information relating to their wages for each pay period (wage slips).
- All deductions to be clearly indicated on worker's pay slips.

ENVIRONMENTAL STANDARDS

- Suppliers must comply with applicable local environmental regulations and such additional environmental standards as ASISL may notify in writing from time to time.
- In any event Suppliers must demonstrate an awareness of environmental matters and a commitment to improving environmental standards (including, without limitation, waste reduction, increased recycling, reduction of pollution, increased use of environmentally friendly products from sustainable sources)

Age

- At the very least, local minimum age laws shall be compelled with.
- International minimum age laws have to be respected and not abused by any overseas supplier.

Development of the code

ASISL recognises that this code must be developed to reflect practical experience and changing circumstances. We will continue to develop and share the best practise with the stakeholders so that we can make real progress along the way.



Accrington Surgical

By entering into an Agreement with ASISL:

ASISL requires their suppliers to 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 ASISL, ASISL 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:

(10.1) Suppliers are not fully compliant with the Core Requirements at any time.

(10.2) If in the reasonable determination of ASISL, Suppliers shall have failed to demonstrate to the satisfaction of ASISL, a genuine willingness to work towards meeting all of the provisions of the Code within a reasonable time.

(10.3) If in the reasonable opinion of ASISL, Suppliers shall have failed to demonstrate to the satisfaction of ASISL, sufficient openness and transparency to allow a robust verification of their working practices.

(10.4) In the event that ASISL 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 ASISL to address any areas of concern.