

LABOUR STANDARD ASSURANCE POLICY

Rev V2 June 2024

Introduction

When making a decision on the procurement of finished goods, raw materials and services Avicenna Surgical Limited always take into account social factors alongside financial considerations. Our purchasing decisions wherever practical consider the whole life costs of a purchase along with any associated risks and implications for society. Avicenna Surgical will never make a purchasing decision based solely on cost, financial gain or profitability.

It is Avicenna Surgical's aim to make an ongoing contribution to reducing the risk of social exploitation throughout not only all of our internal operations, but also throughout the whole of our supply chain. However large or small our goal is to have a positive impact in reducing any form of exploitation around the globe.

This policy sets out the detailed requirements and minimum expectations that Avicenna Surgical expect from our owners, senior management team, staff and all external suppliers.

Objectives

Ethical Procurement

Our ethical objective is to ensure that all people within our supply chain are treated with respect and have rights with regard to employment, including but not limited to the following:

- The rights to freely choose employment
- Freedom of association
- Payment of a living wage
- Working hours that comply with national laws
- Equal Opportunities
- Recognised employment relationship
- Freedom from intimidation
- A safe and healthy working environment

Sustainable Procurement

Avicenna Surgical commit to only procure finished goods, raw materials and services from organisations that can demonstrate compliance to ethical trading, our sustainability objective is to ensure ongoing monitoring and improvement in this area.

Currently we communicate will all our approved suppliers on an annual basis to ensure that standards are maintained and improved.

Avicenna Surgical Ltd

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Manufacturers and Distributors of Medical Devices, Electrosurgery Accessories and Surgical Instrumentation
Company Registration Number 09011101 | Vat Number 193 0512 23



Compliance

Our compliance objective is to adhere to the principals laid out in the NHS Supply Chain Code of Conduct for Suppliers and to rise our current status of external certification to the LSAS standard from Foundation level to Level 2 by the end of the 2025 calendar year. This objective has been revised since our last policy statement in June 2021 and takes into account the impact of the Covid 19 pandemic, other business objectives and the introduction of other standards which the Company is working towards, such ILO.

All critical suppliers are screened and risk assessed prior to being listed as an approved supplier and following the initial approval are assessed on an annual basis.

Our Commitments

Ethical Procurement

We expect our suppliers to comply with legal requirements and to adopt the following moral principles:

Regulatory Compliance

- The supplier shall comply with all laws applicable to its business. The supplier should support the principles of the United Nations Global Compact, the United Nations Declaration of Human Rights, The Modern Slavery Act 2015, as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at work, in accordance with national law and practice.

Employment

- There is no forced, bonded or involuntary prison labour.
- All employee, without exception, have the right to join or form trade unions of their own choosing and bargain collectively, should a significant proportion of the workforce agree.
- Employee's representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Elimination of child labour

- The supplier employs no children under the minimum age of employment consent according to all relevant local and international law.

Statutory Minimum Wage

- The supplier shall comply with the respective national laws and regulations regarding working hours, wages and benefits.
- In any event, wages should not be paid in kind and should be enough to meet basic needs.
- All workers should be provided with written and comprehensible information about their employment conditions in respect to wages before they enter employment and the particulars of their wages for the pay period concerned each time that they are paid.

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- Deductions from wages as a disciplinary measure should not be permitted. Deductions from wages not provided for by national law should only be permitted with the expressed permission (without duress) of the worker concerned. All disciplinary measures should be recorded.

Avoidance of excessive working hours

- Standard working hours must comply with national laws and national benchmark industry standards, whichever afford greater protection to the employee.
- All employees should not on a regular basis be required to work in excess of 37.5 hours per week and should be provided with at least one day off for every 7 days period on average. Overtime requested by the employer must be voluntary and must not be requested on a regular basis

No discrimination

- A policy of equality for all should be in place and there should be 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, religious beliefs, union membership or political affiliation.

Provision of regular employment

- To every extent possible work performed must be on the basis of 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 should not be avoided.
- Examples include the abuse of labour only contracting, sub-contracting, or home working arrangements, through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, or the excessive use of fixed term contracts of employment.

No harsh or inhumane treatment

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

Sustainable Procurement

Working in partnership

- We will seek out organisations that share our commitment to sound ethical performance and improvement. Where applicable we will offer assistance to our suppliers in raising their awareness and social accountability. We will develop partnerships with our suppliers and contractors and work together to minimise the social impacts of our supply chain.
- Sustainability requirements will be considered and where appropriate will be specified in initial documentation for both suppliers and contractors are aware of our social criteria at an early stage in the tender process.
- Small firms, voluntary and community organisations, social enterprises and ethnic minority businesses are considered member of our supply chain as they play an important role in the local economy and contribute to social cohesion.

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Procurement Process

- We will use our purchasing power where practical, to influence and encourage suppliers in order to create a more reliable market for ethically produced products and services.
- Social factors shall be considered in the purchasing process. Specifically this includes considering where the product is made and by whom and whether the organisation complies with local laws and regulations.
- We will add ethical compliance into the procurement cycle by identifying needs, appraising options, design and specification, supplier selection, tender evaluation, contract management and supplier development.
- Ethical concepts will be embedded into all purchasing functions within our organisation.

Monitoring and measuring

- We will seek to establish key performance indicators for ethical procurement where appropriate and monitor and measure the performance of supply chain against them. All suppliers will be contacted annually to request confirmation of their compliance and agreement with ethical procurement practices.

Safe and Health Working Conditions

Below are the minimum criteria which we expect our suppliers to adhere to:

- To provide a safe and healthy working environment bearing in mind international standards, the prevailing knowledge of the industry and of any specific hazards.
- To take adequate steps 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 practical, the causes of hazards inherent in the working practice and environment.
- Provide workers with suitable and sufficient health and safety training, in order that they fully understand the hazards associated with the work activity and environment and the correct practices required to minimise the risks.
- Provide suitable and adequate welfare facilities including toilet facilities, drinking water and food storage where required. Accommodation, where provided, shall be clean, safe and meet the needs of the workers.
- To assign responsibility for health and safety to a senior management representative.

Principles

We will use the following best practice principles to guide the implementation of our policy which include the follows aspects:

Working together

Avicenna Surgical Limited commit to:

- Work collaboratively with suppliers in pursuit of this policy

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- Guide relationships by the principle of continual improvement
- Welcome rather than penalise suppliers identifying activities that fall below this policy and put measures in place for rectifications, improvement and eradication of such activities
- Consider a similar ethical trading standard as a reasonable alternative where suppliers are already working towards sustainability

Making a difference

Avicenna Surgical Limited will, and expect our suppliers to:

- Use a social risk based approach to the implementation of the principles of this policy.
- Focus attention on those parts of the supply chain where the risk of not meeting these requirements is highest and where maximum difference can be made with resource available.
- Avicenna Surgical's suppliers should be prepared to demonstrate the basis of their approach with regard to the above.

Awareness raising and training

Avicenna Surgical Limited will, and expect our suppliers to ensure that all relevant people are provided with appropriate training and guidelines to implement the requirements of this policy.

Monitoring and independent verification

Avicenna Surgical Limited will:

- Recognise that implementation of this policy may be assessed through monitoring and independent verification and that these methods will be developed as our understanding grows.
- We will expect all of our suppliers to provide reasonable access to all relevant information, premises and workers and co-operate in any assessment against our policy, all suppliers should use reasonable endeavours to ensure that sub contractors do the same. All suppliers should also provide workers covered under the scope of this policy with a confidential means to report to the supplier failure to observe it's requirements.

Continuous improvement

Avicenna Surgical will and will expect our suppliers to:

- Apply a continual improvement approach in agreeing schedules for improvements plans with suppliers who are not meeting these requirements
- Base improvement plans on individual case circumstances
- Ultimately, Avicenna Surgical will not do business with a supplier where serious conflicts with our policy are identified and where the supplier fails to take corrective action within an agreed timescale.

Responsibility and Authority

The policy is issued under the authority of the Commercial Director of Avicenna Surgical Limited and responsibility for the implementation of this policy is set out below.

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- Responsibility for the achievement of the objectives set out in this policy rest with the Management Team.
- Managers are responsible for implementing the policy, monitoring it's implementation in the everyday activities of their department and reporting back to the Management Team.
- The Commercial Director is responsible for reviewing the policy and ensuring that it is kept up to date with changes in legislation. He is also responsible for the development of guidance and training on the implementation of the policy and for providing appropriate reports to the board.

Evidence of Compliance

Internal Monitoring

The Avicenna Surgical Management Team will carry out regular monitoring of the implementation of ethical standards to enable us to identify trends and ensure that ethical and social factors are being considered in procurement decisions.

To demonstrate compliance with this policy standard each department is required to provide access to documentation and records for audit purpose.

External Monitoring

Avicenna Surgical are actively working towards formal certification to LSAS and have to achieve accreditation to Level end of 2025.



Approved by
Paul Baker
Commercial Director
June 2024
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