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Prepared by: Thomas Whay		Approved by: Gino Ostacchini
Updated: 24 Aug 2023	Issue No: 9	PPM No: 048

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1. **POLICY**

The organisation manufactures and supplies a range of medical devices throughout the world.

We recognise that our business activities have an impact on our employees, customers, communities and environment in which we operate. This document will detail our policy towards labour.

This policy is relevant to all parties in our supply chain, in particular contractors, subcontractors and suppliers who are all required to confirm that the policy has been read and understood. They are also required to complete the self-assessment questionnaire (Appendix 1).

We 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 any legislation.

We are fully aware of the responsibilities to which we bear to all parties involved in each of the stages involved in producing our products and have, therefore developed a policy to outline the standards we, and ultimately all stakeholders involved in the business, should seek to adhere. The Company shall show a preference, where appropriate, to suppliers with higher labour standards.

The aim of this policy is to promote understanding and awareness of employment law 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 standards required of potential suppliers. It will also assist our employees in managing the Labour Standards Assurance System.

The Company will encourage all parties in our supply chain to develop their own labour standards system and provide help and support to allow them to do this.

Our main objective is to become a progressive ethical company and comply at a minimum Level 2 of the NHS Supply Chain's Labour Standards Assurance System.

This Policy is publicly available via our website www.haag-streit-uk.com.

This Policy will be reviewed at a minimum of every 3 years in conjunction with the Quality Manual.

This Policy has been communicated to all relevant staff, suppliers and sub-contractors and evidence retained. This process continues as and when the policy is updated.

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2. **MANAGEMENT REPRESENTATIVE**

The Management Representatives together with the Lead Buyer , Managing Director, Quality Assurance and Regulatory Manager, Quality Assurance and Regulatory Officer, and Head of Human Resources and Facilities are responsible for implementing an effective Labour Standards Assurance System (LSAS).

Typical responsibilities are as follows:

- Creating and publishing of the LSAS Policy.
- Approving all other relevant and related LSAS policies and procedures.
- Carrying out a periodic review of the LSAS, typically on an annual basis.
- Establishes, implements and maintains an effective labour standards assurance system
- Reports on labour assurance to top management
- To encourage suppliers and other parties key to the business, to comply with the principles of the NHS Supply Chain's Labour Standards Assurance System and/or Ethical Trading Initiative.
- Completing risk assessments to determine the level of risks related to each supplier.
- Ensuring that any corrective action requests raised against a particular supplier, are addressed in a timely manner.
- Allowing all employees sufficient staff time to progress LSAS issues if required.
- Documenting and taking action relating to any concerns about labour issues.
- To comply with UK employment law.
- To align these tasks and duties wherever possible to the Quality Management System.
- To set objectives and targets for the overall improvement of the LSAS.
- To communicate the LSAS issues throughout the Company.
- To carry out training with all employees who may be involved in the LSAS and if applicable other parties.
- To comply with the NHS Supply Chain's Framework Agreements (relevant to specific frameworks and products).

The responsibilities (as detailed in Section 6) will be reviewed during each Management Review meeting.

3. **LABOUR STANDARDS STATUS REVIEW**

This procedure undertakes to identify how labour standards such as the NHS Labour Standards Assurance System and Ethical Trading Initiative relate to the Company and its supply chain.

The Company commits to undertaking a Labour Standards Status Review when contracting a new supplier and carry out regular routine visits to existing suppliers. This will ensure that labour standards throughout our supply chain are satisfactory and continually improving. We recognise that if any contractor or sub-contractor is found to be using unethical or illegal labour programs, this would have a profound

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impact on the reputation and integrity of the Company. Labour standards are assessed to ascertain which standards apply to our supply chain.

Labour Standards Status Reviews and Supplier Performance Reviews are carried out as part of the internal audit process (P0003) on an annual basis or as deemed necessary by the Company (as per P0025). All suppliers will complete a Self Assessment Form (Appendix 1) and this information will be risk assessed and all results will be recorded in the Supplier Database and on the Supplier Mapping Document.

The minimum labour standards are detailed below:

- Employment is freely chosen and there is no forced, bonded or involuntary prison labour. Employees are free to leave upon reasonable notice.
- Child labour shall not be used and young persons under 18 shall not be employed at night or in hazardous conditions and the working day is limited to 8 hours.
- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs and to provide some discretionary income.
- Working hours must comply with national laws, collective agreements and be defined by contracts of employment. All overtime must be voluntary.
- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

4. LEGAL AND OTHER REQUIREMENTS

The Company commits to comply and remain up to date with changes to all employment laws and other employment legislation relevant to our business through the Human Resources Department. Relevant employment legislation with regard to the Company's direct operations is outlined in the Personnel Policies and Procedures. These include, but not limited to: Grievance (PPM 015), Equal Opportunities (PPM 012), Harassment (PPM 016), Training and Development (PPM 038) and Whistleblowing (PPM 040).

We shall comply with the Health and Safety at Work etc Act 1974, as detailed in our Health and Safety Policy and Procedure (PPM 017). The Company shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to employees' health. Employees shall have access to clean sanitary facilities and drinking water.

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 the young persons are not exposed to any hazardous conditions, or in any case work more than 8 hours per day.

The Company shall not engage in or support the use of forced or compulsory labour. Employees are free to leave upon reasonable notice being given.

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The Company shall not engage in or support any discriminatory practices in recruitment, remuneration, access to training, promotion, termination or retirement based on race, religion, national or social origin, gender, sexual orientation, political affiliations, age or other conditions that could give rise to discrimination.

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.

The Company shall comply with applicable laws on working hours, holiday entitlements and all regulations with regard to wages and benefits. It will ensure all employees have the legal right to be employed in the UK.

The sources used to identify and review applicable UK legislation typically are as follows:

Company

ACAS
HSE
CIPD

Website

www.acas.org.uk
www.hse.gov.uk
www.cipd.co.uk

It is the Company's intention to ensure our suppliers conform to local employment legislation as a requisite to supply the Company with goods and/or services. The Company will periodically review the requirements to ensure all future and proposed changes in legislation will be identified and communicated to the relevant supplier.

The sources used to identify and review applicable local legislation typically are as follows:

Company

Ethical Trade Initiative
International Labour Organisation

Website

www.ethicaltrade.org
www.ilo.org

The relevant control document for our suppliers is the self-assessment questionnaire (Appendix 1) which requires the supplier to confirm that they comply with their national laws. This questionnaire will be sent to each supplier by the Management Representative/Lead Buyer for completion at a minimum of every 2 years in line with the supplier review periods stated in P0025.

5. OBJECTIVES, TARGETS AND PROGRAMMES

The Company has established several objectives and targets, these objectives shall be maintained by the review process to ensure they are implemented effectively. The ongoing monitoring shall form part of the Company's internal audit programme which is listed on the Internal Audit Plan (P0003).

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These LSAS objectives have been agreed with the Managing Directors, when practicable have a plan of action in place to demonstrate how the targets may be achieved:

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Process	Objective	Action Plan and Status
Policy	The labour standards and policy requirements that the Company is committed to, both internally and throughout its supply chain.	To launch our LSAS policy within the company and our supply chain and make publicly available. Status: Complete
Legal and Other Requirements	The Company has adequate procedures in place to: Identify information on relevant employment and human rights legislation and other requirements as they apply to its direct operations, contractors, sub-contractors, suppliers and other parties in the supply chain. Communicate this information to employees with responsibility for labour standards assurance.	To establish a way of identifying the legal requirements in areas of the supply chain which are known to be of elevated risk and also a way of maintaining a current understanding of relevant employment legislation. Status: In progress. On-going training and development taking place.
Operational Control	The Company has adequate processes, procedures and systems in place to manage labour standards through its direct operations (including both mitigating the risk of non-compliance and driving improvements). This will include how the Company manages its critical control points.	To document a process for critical control points – supplier approval and site visits – for those suppliers from high risk countries and begin to implement them into business processes. Status: In progress. Control points will be embedded within the QMS and P0025.
Performance Monitoring and Measurement	The Company has adequate procedures in place to collect appropriate information in order to monitor and measure performance in relation to: Its stated objectives and targets. Compliance with relevant legislation and other requirements that it subscribes to. Conformance to planned arrangements for labour standards assurance.	To develop a system that allows us to regularly monitor our compliance to our objectives, targets and relevant legislation. A system that will allow us to identify critical dates and flag action points relating to supplier performance. Status: In progress. Discussed at Management Review Meetings. Information gained from supplier self-assessment questionnaires which are sent out with every QA2 form.

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Corrective Action	The Company has established adequate procedures in order to manage actual and potential non-conformities to its own labour standards assurance systems, including corrective and preventative action.	To demonstrate the procedures we have established, and are using, to manage both actual and potential non-conformities to our labour standards assurance systems, including corrective and preventative action and also document action plans to mitigate and manage any risks that may arise. This would include the use of risk assessments for new suppliers (contained within P0025 and P0041). Status: In Progress, action plans will be managed via CAPA.
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These objectives shall also be reviewed at both the Quality Management Review Meetings and the yearly Board Meetings.

As part of the Labour Standards Status Review (as detailed in Section 3), these objectives will be communicated to all our suppliers.

6. **ROLES AND RESPONSIBILITIES**

This procedure should be read in conjunction with the Company's Quality Manual. Roles and responsibilities are as follows:

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Job Role	Responsibilities
Managing Director	<p>Overall responsibility to ensure that the LSAS policy is effective within the Company and that LSAS objectives and targets are set and met.</p> <p>Ensure the availability of adequate resources to establish, maintain and continually improve the LSAS.</p> <p>Ensure that LSAS is assessed within Board Meetings and Management Review Meetings.</p>
Management Representative (as detailed in Section 2)	<p>Ensure that LSAS objectives and targets are met.</p> <p>In conjunction with the Lead Buyer, supplier management including LSAS status reviews.</p> <p>Carry out risk assessments on supplier questionnaires highlighting any risks and concerns in the supply chain to the LSAS team, including any country specific risks.</p> <p>Ensure that the LSAS supplier mapping document is up to date and fully effective.</p> <p>Identify any risks to the supply chain.</p> <p>Provide advice and support to suppliers on LSAS issues, providing training where necessary.</p> <p>Establishes, implements and maintains an effective labour standards assurance system</p> <p>Reports on labour assurance to top management</p> <p>Ensure that the LSAS policy is fully up to date and current.</p>
Lead Buyer	<p>Ensure that LSAS objectives and targets are met.</p> <p>In conjunction with the Management Representative, supplier management including LSAS status reviews.</p> <p>Identify any risks to the supply chain.</p> <p>Ensure that the LSAS Policy is communicated to all suppliers, including the completion of all required questionnaires and forms.</p>
Quality Assurance and Regulatory Manager	<p>Ensure that LSAS objectives and targets are met.</p> <p>Manage any supplier audits that are deemed necessary in conjunction with the Management Representative.</p> <p>To carry out internal audits, reporting any findings to the Managing Director.</p> <p>Ensure that the LSAS policy is fully up to date and current.</p>
Quality Assurance and Regulatory Officer/Administrator	<p>Ensure that LSAS objectives and targets are met.</p> <p>Ensure suppliers are set up on the system and that they complete all the relevant documentation before they are classed as approved.</p> <p>Highlight any risks and concerns in the supply chain to the Quality Assurance and Regulatory Manager and Management Representative, including any potential country specific risks.</p> <p>Ensure that the LSAS policy is fully up to date and current.</p>
Head of Human Resources and Facilities	<p>Ensure that LSAS training is carried out internally.</p>

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Members of staff involved with the LSAS shall be identified using performance assessments. Target setting for staff involved with the LSAS shall be incorporated into the annual performance assessments.

Resources relating to LSAS will be available to all involved staff through the shared LSAS drive and on the ERP system.

Roles and responsibilities will be reviewed at the Quality Management Review Meetings (or sooner if demands change).

7. **COMPETENCE, TRAINING AND AWARENESS**

This procedure should be read in conjunction with our Training and Development Procedure (PPM 038). Training records are recorded for LSAS on the HR System, this includes information to confirm employee compliance with this policy.

The Company has committed to training relevant employees in order to be competent with handling the labour standards programme. Employees involved with labour standards assurance will have a good understanding of how the Company operates with the knowledge of the supply chain, be in a position to contact suppliers and build a relationship with them and be trained in the Labour Standards Assurance System requirements. The following training needs have been identified as key to the process:

Job Role	Training/Skills Required
Managing Director (Operations)	LSAS awareness. Management experience including resource planning. Awareness of ethical trade issues within the supply chain.
Management Representative (as detailed in Section 2)	LSAS awareness. Knowledge of the NHS Supply Chain. Awareness of high risk countries within the supply chain. Awareness of ethical trade issues within the supply chain.
Lead Buyer	LSAS awareness. Knowledge of the NHS Supply Chain. Purchasing knowledge. Product knowledge. Supplier management experience. Building and maintaining relationships with suppliers. Awareness of high risk countries within the supply chain. Awareness of ethical trade issues within the supply chain.
Quality Assurance and Regulatory Manager	LSAS awareness. Auditing experience. Awareness of high risk countries within the supply chain. Awareness of ethical trade issues within the supply chain. Knowledge of the NHS Supply Chain. Risk assessment knowledge.

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Quality Assurance and Regulatory Officer/Administrator	LSAS awareness. Awareness of high risk countries within the supply chain. Awareness of ethical trade issues within the supply chain. Knowledge of the NHS Supply Chain. Knowledge of suppliers.
Head of Human Resources and Facilities	LSAS awareness. Disciplinary/grievance handling skills. Counselling skills. Knowledge of employment law within the UK. Awareness of labour laws worldwide.

Additional training to gain greater competence will be arranged on a case by case basis dependent on how the employee can have an influence on labour standards. All staff involved in the LSAS process will receive yearly refresher training, either in the form of a course or through signing a training form against this policy.

As and when new country specific information is released, training forms will be completed by all staff involved in the LSAS process.

All employees (as detailed in Section 6) who are directly involved in the management of LSAS will be reviewed annually in their Performance Assessment and any additional training and development needs identified to ensure compliance and development of the LSAS will be actioned by the Human Resources Department.

8. COMMUNICATIONS

Since the LSAS is embedded into the Quality Management System, the existing training systems, quality systems and recorded communication will be used to address LSAS issues. These procedures will ensure effective and appropriate communication is in place for internal communication, receiving and responding to correspondence from interested parties relating to labour standards, protecting information from whistle blowers and the external communication carried out by the company concerning the practices and performance of our labour standards.

Interested parties could include (but not limited to) legislators, regulators, customers, suppliers, enforcement agencies, certification bodies, notified bodies, competent authorities, local authorities and trade unions. The web-site link to this Policy is a good communication channel to all stakeholders.

Any breaches of LSAS identified should be reported to the Management Representative, who will then use the CAPA system (P0041) (Section 14) to log and monitor any adverse allegations, complaints or alerts (as detailed in Section 12 Emergency/Critical Issue Response). Top management will also be made aware by the management representative of any LSAS breaches. Communication to the management representative must include who reported the breach, the date the breach was reported and occurred and full details of the reported LSAS breach.

The Company requires each supplier to record what their communication channels are for their employees to report any LSAS issues. This information will be recorded

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in the Self-Assessment Questionnaire (Appendix 1) and then stored on the Supplier ERP System. The Company will send a copy of the Whistleblowing Policy (PPM 040) to all suppliers together with the Self Assessment Form. The Company may ask any high risk supplier identified from the risk assessment process for evidence that this policy has been shared with their workers.

The Company shall receive and respond to allegations, complaints or other alerts about labour standards issues as part of our Whistle Blowing Procedure (PPM 040). Whistle Blowing can be reported directly to the Head of Human Resources and Facilities on +44 1279 414969 or kennedy.reed@haag-streit.com

Key communication issues shall be reviewed at the Management Review Meeting together with any information from whistle blowers.

9. **DOCUMENTATION AND RECORDS**

This Policy should be read in conjunction with our Control of Internal Document Procedure (P0766).

Documentation and records in relation to LSAS shall be kept using standard document and record keeping procedures in line with other quality documents contained within the Quality Manual. Any changes to this policy will be recorded within the revision history and will be sent to the Managing Director for authorisation.

Our documentation is also used to maintain the Critical Control Points (CCP) (detailed in Section 10) that could have an impact (positively or negatively) on labour standards.

10. **OPERATIONAL CONTROL**

For the direct operation of the Company, the Quality Manual 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. This operational control process shall also consider the method used to manage our Critical Control Points.

The objective of P0025 (Evaluation, Selection and Monitoring of Suppliers) is to ensure that the initial supply of material, factored product or services from an outside source is of a satisfactory nature and then to monitor supplier performance thereafter.

The senior management of the Company has identified the Approved Supplier List as a critical control point for labour standards in the supply chain. In addition to the Approved Supplier List, the Company's documentation (Section 9) is used to maintain the following Critical Control Points:

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No	Critical Control Point	Impact on Labour Standards	Operational Control Procedures
1	Appointing new supplier/approved supplier.	Supplier does not have in place adequate labour standards.	Approved Supplier List Supplier self assessment questionnaire (PPM 048)
2	Identifying non-conformances and agreeing corrective actions.	Potentially improving labour standards.	Risk assessment CAPA Procedure (P0041)
3	Carrying out Supplier Performance Reviews.	Identify gaps in supplier's documentation which may pose additional risks to labour standards.	Evaluation, Selection and Monitoring of Suppliers (P0025)

These CCP's will be reviewed during the Management Review Meetings.

The Company holds a backlog of stock (average 1-2 months) in the UK to ensure the supply chain is not compromised.

The Company also plans ahead using forecasting and sales as a tool, any projected increases are communicated to suppliers as soon as reasonably practical to ensure the supply chain is not compromised.

All audit results from LSAS Supplier Questionnaires and Supplier Performance Reviews are recorded in the Supplier Mapping Document.

11. **SUPPLY CHAIN MANAGEMENT**

This procedure should be read in conjunction with our Evaluation, Selection and Monitoring of Suppliers Procedure (P0025).

The Company commits to monitoring and maintaining the labour standards in 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 usually take place annually or by using assessments at various control points.

The Company will maintain a database of all approved suppliers.

New suppliers 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. All new suppliers will receive a copy of this policy together with a copy of the NHS Code of Conduct.

Information has been collated relating to our supplier's labour standards performance utilising the Supplier Self Assessment Questionnaire. Key suppliers have been identified from the Approved Supplier List and transferred to the Supplier Mapping Document.

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If a supplier does not return their new/updated documentation within 5 working days a follow up email will be sent with a notification that their account will be put on hold preventing any transactions and the Purchasing Department will be notified.

If the required documentation has not been received within a total of 10 working days from origination, the Purchasing Department will be contacted as to how they would like to proceed and the account put on hold.

The country of origin of each supplier has been recorded in the Supplier Mapping Document. The function they perform has been demonstrated by the device/materials they provide. Their position in our supply chain has been determined by the amount of orders they have received from us.

Reviews shall be taken at routine visits and quality audits to suppliers to ensure they continue to comply fully with the LSAS. The findings of supplier visits shall be reviewed and recorded during Management Review Meetings.

Data received from the supply chain is then risk assessed to determine a suppliers continued suitability. If necessary, any issues would be highlighted at the Management Review Meeting with a decision reached on further actions.

When applicable, the Company shall send other information to members of the supply chain such as the ET1 Base Code and our Whistleblowing Procedure (PPM040) and any relevant updates/information.

Upon request, other parties that are beyond our direct supply chain may request information relating to our labour standards performance. This will be arranged on a case by case basis.

Periodically we reserve the right to request additional evidence of labour standards compliance from our suppliers. Examples could include obtaining copies of workers contracts of employment from suppliers manufacturing in high risk areas.

During the verification of our suppliers performances, if a non-conformances are identified the corrective action process (Section 14) should be followed.

12. EMERGENCY/CRITICAL ISSUE RESPONSE

The Company shall identify and document responses to significant labour standards issues and risks. The procedure adopted shall be appropriate to the problem and reflect the current hazards.

This process shall be achieved by evaluating any action taken during a periodic review. The Company will react, using the CAPA system (Section 14), to any event that signals a serious breach of our labour standards.

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Typical significant risks and issues include:

- Migrant workers - discriminated against.
- Dormitories – sub-standard lodging provided to workers with poor safety and hygiene.
- Failure to pay minimum wage – being paid a lower wage than nationals.
- Double book keeping – factory workers working long hours is hidden data in separate books.
- Unpaid internships – potential for forced labour.
- Controlled trade unions – little freedom of collective bargaining.
- Corruption – employees paid to “turn a blind eye” to unsafe practices.
- Deterioration in the environment – water pollution.
- Breach of labour laws and standards – noncompliance with the LSAS.

Dependent on the criticality or significance of the issue, the Company will put in place a basic plan for each matter. This plan could also be created as a result of a Status Review (Section 3) where a supplier is declared to be manufacturing in a high risk area.

A number of methods to manage escalations could be adopted in the plan including:

- Any risk identified shall be assessed using Form P0041F(3), following a LSAS Emergency and Critical Issue Response.
- Ascertain whether the breach is major or minor (view ETI Base Code corrective action for clarification). Raise a non-conformance using the CAPA Process and discuss the corrective actions with the supplier. All agreements should be documented P0041F(3) and a copy sent to the supplier. All information must be logged on the Supplier Mapping Document.
- Commence seeking an alternative supplier if the existing approved supplier does not implement corrective action in a timely manner.
- Inform the suppliers/contractors Certified/Notified Body to carry out an unannounced visit relating to the organisations responsibilities of senior management.
- Notify the relevant national enforcement office to intervene.
- Suspend the supplier/contractor from our Approved Supplier List. If an existing supplier is at risk, the Lead Buyer will check with the Managing Director before placing any additional orders with that supplier.

Where possible the company will multi source all items to enable us to take any action without causing a disruption in our overall supply chain and therefore compromise our clients. The company will also, where possible, hold safety stock for critical items. The Company will notify the NHS Supply Chain immediately of any significant breaches of LSAS identified.

Our supplier database, will include details of alternative suppliers (where possible) against each existing product category to enable the supply chain to remain intact in the case of temporary non-compliance by any one supplier.

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All emergency and critical issues will be reviewed at the Management Review Meetings.

13. **PERFORMANCE MONITORING AND MEASUREMENT**

Data shall be gathered to monitor and measure our stated Objectives and Targets (Section 5), compliance with Legislation and other Requirements (Section 4) and conformance to Labour Standards Status Review (Section 3).

The following LSAS data will be subject to review at the Management Review Meetings:

- Number of supplier visits/audits carried out.
- Number of suppliers approved.
- Number of non-conformances raised.
- Number of LSAS related CAPA's raised and closed.
- Number of Employment Tribunals claims registered.
- Number of whistle blower reports.
- Number of supplier questionnaires returned.
- Number of risk assessments carried out and their results.
- Number of observations for improvement documented during internal and external audits.

The Company will conduct Internal Audits on this policy to ensure full compliance to LSAS and the outcome is reviewed as part of the LSAS element of the Management Review Meeting.

14. **CORRECTIVE ACTION**

This procedure should be read in conjunction with our CAPA Procedure (P0041).

The current CAPA system will be used to document improvements from labour standards audits. The following timescales should apply:

Major non-conformances – Immediate to one month (dependent on criticality).

Minor non-conformances – No more than three months.

Observations for improvement – Dependent on issue.

All corrective actions (including those identified during an internal audit) will be reviewed at the Management Review Meetings.

The Company shall wherever practicable identify the root cause of any issues and non-conformities raised (P0041) including preventative actions and evaluation of effectiveness of actions.

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15. **MANAGEMENT REVIEW**

The Company will review LSAS during the Management Review Meetings (P0011) to ensure its continuing suitability and effectiveness. These reviews are held once a year and include top management. LSAS policy and plan of action are to be reviewed and approved by top management at planned intervals in accordance with P0766 and when updated.

Quality Management Review meeting notes will be taken and an electronic copy will be held on the HSUK Quality Drive. Minutes of previous Management Review Meetings shall be reviewed and confirmed as accurate prior to the commencement of the next meeting.

The meeting will review the following LSAS topics:

- Review the LSAS Policy and confirm it remains suitable and effective.
- Confirm that the duties of the Management Representative have been accomplished.
- Review the status of LSAS and check labour issues and risk assessments.
- Check legal and other requirements remain current.
- Monitor objectives and targets.
- Review roles and responsibilities and check adequate resources are available.
- Check awareness of LSAS.
- Evaluate internal and external communication.
- Check that all documents are subject to the normal documentation controls.
- Review Critical Control Points.
- Assess the management of our supply chain.
- Review any emergency and critical issues.
- Monitor and measure KPI's.
- Consider any corrective and preventive actions if applicable.
- Review any internal audit findings if applicable.

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Appendix 1

Supplier Self-Assessment Questionnaire

The Company is committed to upholding our Business Ethics Policy (PPM022) in-line with its legal and moral obligations. We 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 is exploited or treated in a way that breaks any legislation.

Our main aim is to become a progressive ethical company and comply with the NHS Supply Chain's Labour Standards Assurance System and the ETI Base Code (<http://www.ethicaltrade.org/eti-base-code>).

Our intent with this questionnaire is to allow our suppliers to demonstrate the steps they are taking to effectively identify and manage labour standards risks and opportunities.

Suppliers are encouraged to respond candidly and completely to the questionnaire, establishing a true baseline of practices and management from which future improvements and impact can be tracked, measured and communicated. Answers can be entered directly into the questionnaire and additional documentation attached as required.

General Information

Site Details	
Company Name:	
Address:	
Telephone Number:	
Main Contacts (include job title and email details):	
Date of Self Assessment:	
Name and Address of Parent Company:	

Workforce Profile		
Total number of permanent employees:		
Percentage of permanent employees that are male/female:	Male (%):	Female (%):
Total number of temporary workers:		
Percentage of temporary workers that are male/female:	Male (%):	Female (%):
Total number of homeworkers:		
Percentage of homeworkers that are male/female:	Male (%):	Female (%):

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		Office Use Only
Do you have a system in place to ensure that all employees provide documents to prove that they have the right to work in the country?	Yes/No	
Do you use employment agencies/labour providers?	Yes/No	
If yes to the above question, do you have a system in place to ensure the agencies/labour providers check to ensure the workers have the right to work in the country?	Yes/No	
Are all employees provided with a written contract of employment? Please provide a sample.	Yes/No	
What are your standard weekly hours of work? Please provide details on how working hours are recorded.		
What is the age of your youngest worker? Please provide an example of a Young Person Risk Assessment.		
Does the Company have effective procedures for verifying workers ages?	Yes/No	
Do you comply with the national minimum and living wage?	Yes/No	

	Workplace Management	
Do you have written personnel policies that cover the following topics, please provide copies:		
Hours of Work	Yes/No	
Grievance	Yes/No	
Bullying/Harassment	Yes/No	
Holiday and Other Time Off	Yes/No	
Wages and Benefits	Yes/No	
Equal Opportunities	Yes/No	

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Do you have a written policy on the prevention and elimination of child labour? Please provide a copy.	Yes/No	
How do you keep upto date with employment legislation?		
How do employees and workers know their rights?		
Do you have a written health and safety policy? Please provide a copy.	Yes/No	
Do you have a dedicated responsible person responsible for health and safety?	Yes/No	
How do you communicate your policies to your workforce?		
Are employees and workers free to resign from their employment at any time without penalty, giving reasonable notice?	Yes/No	
Are employees and workers free to leave site during non-working hours and at the end of their shift?	Yes/No	
Does the Company withhold employees/workers ID Cards or Passports?	Yes/No	

Sub-Contracting	
Do you have any sub-contracting?	Yes/No
If yes to the above, please list all countries sub-contracting is carried out in.	

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Supplier Management		
What countries do you purchase from? Please list all and include what is purchased from each country.		
Do you visit your suppliers for monitoring purposes?		
What procedures do you have in place to ensure that all suppliers operate in compliance with all applicable labour laws and regulations? Please provide copies of any LSAS/Purchasing/Supplier Management Procedures.		
What procedures do you have in place to assess and manage identified risks relating to the labour practices of suppliers? Please provide copies.		

Audits
In the past two years, have you had a third party audit? If so, please attach a copy of the results.

Any additional comments

Signed:

Please note that by signing this document, you acknowledge that you have read and understood our Labour Standards Assurance Policy (PPM 048) and our Whistleblowing Policy (PPM 040). You also agree to adhere to this policy and the NHS Supply Chain's Labour Standards Assurance System.