

Ref No. Pol/026	Prometheus Medical Limited	Issue No. 03
Title:	Labour Standards Assurance System Policy	
Written by:	Dr Malcolm Russell, CEO	Date: 4 December 2018
Effective Date: 4 December 2018	Review Date: 4 December 2019	Page 1 of 4

STATEMENT OF INTENT

As CEO of *Prometheus Medical Ltd*, I recognise the importance of establishing a comprehensive system of minimum labour standards to promote understanding and awareness of employment laws and ethical standards across the business. The company acknowledges its obligations towards its employees, stakeholders and the communities in which it works and has outlined below its policy in relation to labour standards. The policy is relevant to the Company itself, its contractors, sub-contractors, suppliers, freelancers, members of the public and other parties engaged with the Company's business.

Through its compliance with mandated Company policies related to employment and ethics, the Company has defined and committed to exceeding, as far as reasonably practicable, the following set of minimum labour standards whilst also working to ensure it receives the same commitment from its supply chain; it is incumbent on both management and staff to assist in achieving this aim in all aspects of the Company's business:

- a. **Child Labour** – The Company does not and will not support the use of child labour. As outlined in the Company's Fair Employment Policy and consistent with the United Nations Convention on the Rights of the Child and the Children's Rights and Business Principles the Company respects and supports children's rights.
- b. **Forced or Compulsory Labour** – In accordance with the Company's Fair Employment and Corporate and Social Responsibility Policies the Company shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave after providing reasonable notice in line with their individual contracts of employment.
- c. **Health and Safety** – In accordance with the Company's Health and Safety Policy Statement the Company commits to providing a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injuries to employees' health by minimising, so far as reasonably practicable, and in cooperation with its employees, workers and other members of staff, the causes of

hazards inherent in the workplace. All employees will receive safety and job specific health and safety instructions during their employment with the Company, which will be managed by a dedicated team of Health and Safety representatives as detailed in the relevant policy.

- d. **Freedom of Association** – In accordance with the Human Rights Act 1998 the Company respects the rights and freedoms of all individuals and will comply with all UK labour relations legislation in this regard.
- e. **Discrimination** – The Company shall not engage in or support any discriminatory practices in recruitment, remuneration, access to training, promotion, termination or retirement based on gender, marital status, family status, religious belief, disability, age, racial grounds (race, colour, nationality or ethnic origin), sexual orientation or other conditions that could give rise to discrimination. The Company has in place an Equal Opportunities Policy and a Dignity at Work Policy; both of which are provided to new employees at induction.
- f. **Disciplinary Practices** – The Company shall treat all employees and members of staff with dignity and respect as mandated in the Company’s Dignity at Work Policy. The Company shall not engage in or tolerate the use of corporal punishment, mental or physical coercion, harassment or verbal abuse of personnel.
- g. **Anti-bribery and Corruption** – The Company is dedicated to conducting business fairly, honestly and openly and without bribery in accordance with the UK Bribery Act 2010 and the Company’s Policy in relation to it.
- h. **Working Hours** – The Company shall comply with applicable local laws and industry standards, in all countries where products are sourced, on working hours and holiday entitlements as outlined in the Company’s Fair Employment Policy.
- i. **Remuneration** – The Company shall comply with national law and regulations with regard to wages and benefits. All work-related activities are carried out on the basis of a recognised employment relationship established according to national law and practice. All members of staff are remunerated in a way that is in excess of the national minimum wage in the UK or local country of employment as appropriate. The Company is committed to the Living Wage for staff and third-party contractors, details of which are outlined in the Company’s Living Wage Policy.

The Company seeks to achieve continual compliance with the set of Company Policies, all of which are periodically reviewed and updated in accordance with individual legislation.

Central to the successful provision of the above, the Company also commits to:

- Ensuring compliance with all relevant legal and other legislated requirements to which the Company subscribes;
- Ensuring that all our key contractors, sub-contractors and suppliers are aware of this policy and confirm their compliance with such controls through the submission of an Ethical Compliance Form; and
- Making available sufficient resources for the implementation and continual improvement of this policy.

In order to manage its labour standards assurance system, the Company has set the following targets:

- LSAS Supplier Questionnaires (Vendor Assessment Ethical Sourcing) to be returned by supplier within 10 working days
- A formal management review of LSAS will be conducted annually
- LSAS corrective actions to be closed within 6 months

These targets will be reviewed as part of the Company's annual Management Review.

ORGANISATION

The overall responsibility for the minimum labour standards system within *Prometheus Medical Ltd* is that of:

Dr M Russell MBE
Prometheus Medical Ltd
The Old Rectory
Hope Under Dinmore
Herefordshire HR6 0PW

I have appointed the following Management Representative to ensure Company compliance with this policy:

Mrs Samantha Edwards
Director of Operations
Prometheus Medical Ltd

The responsibilities of the Management Representative are:

- To communicate labour standard issues to management and staff
- To liaise with companies within the supply chain regarding labour standard status
- To set objectives and targets for labour standards assurance

- To review the Labour Standards Assurance Scheme Policy on an annual basis or when legislation changes, and improve where possible
- To implement training for staff responsible for LSAS related activities, and awareness of LSAS for all new employees

I expect the nominated Management Representative to implement this system and all employees to cooperate with its aims, by bringing to my attention any areas of operation that are not subject to existing controls.

I, in turn, will ensure that prompt action is taken to address newly identified gaps and install adequate measures to immediately resolve as far as reasonable practicable.

CORRECTIVE ACTION

The current QMS will be used to document corrective actions and reviews.

AWARENESS AND TRAINING

Newly employed staff are to receive appropriate minimum labour standards induction training and where a need for other training is identified, to enable members of staff to carry out their duties placed upon them in the most appropriate and ethical manner, then suitable training will be given. Annual refresher training will be available to all employees or as and when new legislation is brought in.

STATEMENT REVIEW

The Company commits to periodically reviewing this policy to continually improve labour standards within the workplace. The Company shall take into consideration: changes in legislation, legal advice as necessary and any other requirements to which the Company subscribes, to ensure the adequacy, suitability and continuing effectiveness of this policy as well as to ensure policy objectives are continually being met.

REVISION HISTORY

Issue No	Effective Date	Changes Made
Pol/026/01	13 Dec 2017	New
Pol/026/02	22 Dec 2017	Addition of targets, responsibilities, corrective action
Pol/026/03	4 Dec 2018	No changes made