



Labour Standards Assurance Policy & Management System

REVISED VERSION – APPROVED BY COMMERCIAL DIRECTOR
ZAIN REHMAN

EMPIRE MEDICAL UK LTD, 71-75 SHELTON STREET, COVENT GARDEN, LONDON, UNITED KINGDOM
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EMPIRE MEDICAL UK LTD LSAS Ethical Procurement Policy

1. Policy:

EMPIRE Medical UK Ltd supplies a broad range of medical products within the U.K and Europe. As a supplier, Empire Medical recognises our obligation to provide our customers with high quality, professional medical instruments at a competitive price at the best quality.

Empire Medical is committed to upholding an ethical labour policy which is appropriate in nature and scale to the organisation and in-line with its legal and moral obligations as defined by relevant law, employment legislation and International convention. The standards expected not only apply to those who are directly employed within the supply chain but also to members of the public and interested parties who have an indirect involvement within the supply chain.

All of our suppliers were sent the copy of the policy recently and all the employees involved were communicated with it with the evidence retained.

To achieve this, we continually assess and monitor our own performance and process controls and also those of our trading partners. Through this monitoring approach we aim to ensure that our standards are continually improving. Empire Medical commits to making available sufficient resources for the implementation of this policy as appropriate to the nature and scale of its operations. The requirements detailed in this document must be sensitive to the rights and livelihoods of the workers it is aiming to protect.

Empire Medical will make our standard LSAS Policy publicly available at or website <https://www.empiremedical.co.uk/>, the Policy has also been communicated to all employees, contractors, sub-contractors and suppliers.

For this purpose, Empire Medical UK has drawn up the Supplier Code of Conduct, which sets the appropriate standards for doing business with us.

These ethical standards cover:

- Child labour
- Forced or compulsory labour
- Freedom of association and right to collective bargaining
- Discrimination
- Health and Safety
- Working hours
- Remuneration

- **Our Strict Minimum Labour Standards:**

Empire strictly do not employ or get the support of child labour. If any young workers are employed usually on work experience or internships suitable risk assessment is carried out and safety training is provided and are not exposed to hazardous conditions and it is made sure they don't work more than 8 hours.

Empire will not in any circumstances hire anyone aged under 18 which would hinder a minor from completion of compulsory schooling or training or if the employment will be harmful to their health and safety. (reference: ILO Convention 138(7))

- **Forced Labour:**

Empire shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave upon reasonable notice.



Freedom of Association and Collective Bargaining

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

- **Discrimination:**

Empire will not engage or support any form of discrimination in its employing of staff, salary, training, promotion, termination or retirement based on race or national or social origin, caste, religion, gender, sexual preference, political affiliations, age or other circumstance that could be classed as discrimination.

Disciplinary Practices – Empire will treat all employees with dignity and respect. Empire shall not or tolerate the use of corporal punishment, mental or physical bullying or verbal abuse of personnel. No cruel or inhumane treatment is allowed.

- **Health & Safety:**

Providing a safe and healthy workplace environment is one of the main priorities of Empire. And we have taken numerous steps to prevent accidents and injuries in the process of manufacturing in our factory. All employees will find safety and job specific instructions on the walls in the manufacturing places along with that instruction cards will be provided in the language which is easier for them to read. Also, a brief introduction on the safety features is given as well and explaining the steps to take in emergency situations such as during a fire. Empire provides clean sanitary facilities and drinking water. We have separate team to ensure health and safety is maintained throughout the suppliers and manufacturer.

- **Working Hours & Compensation:**

Empire shall comply with relevant laws and labour standards on working hours and holiday entitlement. Empire's working hours do not exceed 48 hours per week and overtime hours do not exceed 12 hours per week. Empire ensures that all employees have the legal right to be employed in the UK.

Remuneration- Empire shall comply with national laws and regulations relating to wages and benefits. All work associated activities are carried out on the basis of a recognised employment relationship established according to national law and practice.

- **Business Continuity Plan:**

The supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases). This preparedness especially includes disaster plans to protect both employees and the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

- **Improper Payments/Bribery:**

The supplier shall comply with international anti-bribery standards as stated in the United Nations' Global Compact and local anti-corruption and bribery laws including The Bribery Act 2010. In particular, the supplier may not offer services, gifts or benefits to Empire Medical's employees in order to influence the employee's conduct in representing Empire Medical.

- **Environment:**

Empire is committed to protecting the environment both through our own actions and also by working with our suppliers. We will continue to focus on delivery high standards of service and quality of goods to our customers. We will comply with all regulatory and legislative requirements and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.



We expect our suppliers to strive to support Empire's climate protection goals through the products and services they deliver (e.g. by providing relevant data on climate protection). In this regard, we also expect our suppliers to take climate protection appropriately into account in their own operations, for example by setting climate protection goals for themselves and achieving them.

- **Business Partner Dialogue:**

The manufacturer shall communicate the principles stated in the Supplier Code of Conduct and detailed above to its subcontractors and other business partners who are involved in supplying the products and services described in the main contract. The supplier shall motivate such parties to adhere to the same standards.

Compliance with the Supplier Code of Conduct Empire Medical reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier Code of Conduct. Empire Medical encourages its suppliers to implement their own binding guidelines for ethical behaviour.

Empire Medical's policy in relation to labour standards as relevant to the organisation itself, contractors, sub-contractors, suppliers and any other parties engaged through the supply chain is as follows:

- We shall comply to all Employment Laws relevant to our business
- We comply to the Health and Safety at work Act 1974.
- We comply with all other Employment legislation.
- Our compliance with the above is kept up to date using an external HR company
- We will work towards the ETI Base Code. This demonstrates compliance with the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with international, national and local law and practice
- We shall encourage all suppliers and contractors to adhere to the Ethical Trading Initiative as part of their respective contracts.

Corrective Action:

The current CAR quality system will be used to document improvements from labour standards audits.

2. Management Review:

The Management Representative shall review the Empire Medical's Labour Standards Assurance System (LSAS) at orchestrated intervals, to ascertain its perpetuating opportuneness, adequacy, and efficacy.

The Commercial Director will withal report on LSAS as a component of a wider Business Ethics review held twice per year at Empire Medicals Board Meetings.

NOTE: This policy is available in complete detail, please email us to get the copy enquiries@empiremedical.co.uk



NAME: ZAIN REMAN (Approved by Company Director)

SIGNATURE:

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