

Labour Standards Assurance System Policy

Sirane Ltd manufactures and supplies a range of absorbent and disposable medical products. These include; - Absorbent theatre mats, Tourniquet drapes and absorbent disposable pouches.

Resulting from its business operations, the Company acknowledges its obligations towards its customers, employees and the communities in which it works, and has decided to document its policy in relation to labour standards and for this document to be approved by senior management; specifically, by **Simon Balderson - Managing Director**.

The company acknowledges its obligations towards customers, employees and communities in which it works and the responsibilities it encourages all parties involved in each of the stages in producing our products. To achieve these aims Sirane has developed an Ethical Trading Policy based on the internationally recognised ETI Base Code.

Sirane can confirm that this policy is relevant throughout the organisation, subcontractors and suppliers.

SCOPE OF POLICY

Sirane Ltd. has applied this policy in order to supply into the NHS via the issued framework agreements for the product groups listed within WR130 – Supply Chain Map.

COMMUNICATION

This policy has been communicated to all employees. Furthermore, new employees will agree to our ethical standards are made aware of our procedures on the subject as part of their initial induction. In addition, all key suppliers and contractors that work with Sirane Ltd. have been sent a copy of this policy to review. All direct suppliers and contractors have agreed to the standards upheld by Sirane. All records are retained on file.

COMMITMENT

In order to ensure Sirane Ltd remains current with relevant legislation within its supplier's country of origin it has subscribed to Social Accountability International and Business & Human Rights Resource Centre who provide newsfeeds regarding human rights, labour and anti-corruption legislation and all who seek to improve international labour conditions.

Sirane Ltd will review and maintain this policy on annual basis to ensure compliance with the NHS LSAS system to a minimum of level 3 compliance.

Sirane Ltd is committed to compliance of the NHS Supplier Code of Conduct and recognises that its responsibility for human rights and labour conditions encompasses its supply chain as well as direct business operations. Sirane Ltd is committed to working with its suppliers to help them improve human rights and working conditions to ensure internationally accepted labour standards are met throughout the supply chain.

This policy outlines the ethical standards required of all suppliers, contractors and sub-contractors. We understand that subcontracting may occur throughout the supply chain and require our suppliers to communicate in full the detail of where and under what circumstances sub-contracting is taking place.

Sirane Ltd requires written confirmation of acknowledgment from all suppliers and contractors to confirm full compliance with all standards detailed within this policy.

and shall be provided with reasonable and adequate time off. Overtime shall be voluntary, shall not be demanded on a regular basis, and shall always be compensated at a premium rate.

Discrimination

The company shall not discriminate against any person based on race, caste, national origin, religion, age, gender, disability, marital status, sexual orientation, union membership or political affiliation (ILO Declaration on Fundamental Principles and Rights at Work, 1998).

Regular Employment Is Provided

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 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.

No Harsh or Inhumane Treatment is allowed

Physical abuse or discipline, the threat of physical abuse, sexual abuse, verbal abuse or other forms of harassment or intimidation shall be prohibited. All disciplinary measures should be recorded.

In order to drive compliance and assure effective implementation of this policy, and achieve continual improvement, Sirane commit to the following Principles of Implementation and will:

- ❖ Dedicate ownership of the Policy to a management representative (HR Manager) and dedicate operational responsibility to others where necessary.
- ❖ Adequately communicate the Policy both internally and externally, ensuring that all relevant employees suppliers and contractors are aware of the Policy and its Principles of Implementation.
- ❖ Recognise their suppliers' ethical and responsible sourcing policies where they are comparable to Sirane's.
- ❖ Provide appropriate training, capacity building, resource and guidance to support the implementation of this Policy.
- ❖ Require all suppliers to confirm in writing that they have received, understood and are working towards compliance with the Policy.
- ❖ Require suppliers to disseminate the LSAS Policy through their own supply chain, requesting and returning to Sirane Ltd signed acknowledgment from those who constitute Sirane's suppliers for the framework.
- ❖ Require all suppliers to report their level of compliance to this Policy through the return of self-assessment questionnaires (SAQs)
- ❖ Regularly review their suppliers' commitment to supporting the Policy through periodic communication and assessment.
- ❖ Maintain an internal system to record and monitor the level of compliance to this Policy.
- ❖ Cease trading with suppliers demonstrating persistent disregard for the Policy, considering the impact this may have on the workers and communities in which the supplier operates.

- ❖ If, in the reasonable opinion of Sirane Ltd, Suppliers shall have failed to demonstrate to the satisfaction of Sirane Ltd, sufficient openness and transparency to allow a robust verification of their working practices.

In the event that Sirane Ltd 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 Sirane Ltd to address any areas of concern

RESOURCES

Adequate and sufficient resources will be made available to the LSAS requirements. This will equate to time and financial backing to the standard.

AVAILABILITY

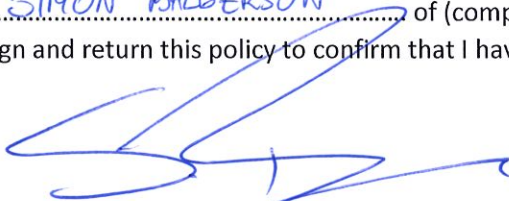
This policy and relevant parts to this manual are available on the company's website: <http://www.sirane.com/>.

For further information please refer to the company hand book. *WR280 – Company Handbook*

Approved by: Simon Balderson (Managing Director).

I (name) SIMON BALDERSON of (company name) SIRANE
hereby sign and return this policy to confirm that I have read and agreed to the above policy.

Signed:



Date:

15/10/2021