

Labour Standards Assurance System (LSAS) Policy

LSAS 010

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Objectives of the Code

Scala Surgical Ltd is deeply committed to upholding the highest standards of social, ethical, and environmental conduct, recognising the pivotal role of corporate responsibility in achieving sustainable objectives.

We proudly align with the principles of the UN Global Compact, drawing significant inspiration from the Ethical Trade Initiative Base Code, which champions human rights, labour rights, environmental stewardship, and anti-corruption measures.

As a trusted provider to the UK Healthcare market, we are unwavering in our commitment to ensuring that our entire supply chain mirrors our dedication to these standards. Our Code of Conduct is meticulously crafted to guarantee that all stakeholders either fully comply with its stipulated codes of conduct or are making genuine strides towards their full adoption.

Scope of application

Re-useable Surgical Instruments and Sterilisation Baskets bought and sold by Scala Surgical Ltd which have been sold into the Healthcare segment both domestically and internationally.

Application of the Code

- 1. Minimum Standards: This Code sets baseline standards; exceeding them is encouraged.
- 2. **Local Laws:** Companies must adhere to all applicable local and national laws.
- 3. **Greater Protection:** When the Code and local laws overlap, the more protective provision applies.
- 4. **Definition of Workers:** This includes both temporary and permanent employees, whether hired directly or indirectly.
- 5. **Supplier Expectations:** Suppliers should either meet these standards or show progress towards them.

Laws and Ethical Standards

- The Code is taken from the Ethical Trading Initiative (ETI) Base Code, which is in turn founded on the conventions of the International Labour Organisation (ILO).
- The supplier shall comply with all laws applicable to its business locally & nationally. The supplier should adhere to the principles of the United Nations' Global Compact, UN Declaration of Human Rights as well as the 1998 International Labour Organisation's "Declaration on Fundamental Principles and Rights at Work" in accordance with national law and practice.
- The supplier shall ensure conformance to all laws applicable in their nation and locality.



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Base Code

1. Employment Choice

- Employment is voluntary, without forced or bonded labour.
- Workers can freely leave after giving reasonable notice and aren't required to leave deposits or identity papers.

2. Association & Bargaining Rights

- Workers can freely join/form trade unions and bargain.
- Employers support trade union activities.
- Worker representatives are protected and can function in the workplace.
- If these rights are legally restricted, employers support alternative means for association and bargaining.

3. Safe Working Conditions

- A safe and hygienic environment is provided.
- Workers get regular health and safety training.
- Clean toilets, drinkable water, and sanitary food storage are available.
- Provided accommodation meets basic needs.
- A senior manager oversees health and safety.

4. No Child Labour

- No recruitment of child labour.
- Support for transitioning child labourers to education.
- No night or hazardous work for those under 18.
- Adherence to ILO standards regarding child labour.

5. Fair Wages

- Wages meet or exceed national or industry standards and cover basic needs.
- Workers receive clear information about their wages.
- No wage deductions as punishment or without worker consent.

6. Reasonable Working Hours

- Hours align with national laws or industry standards.
- Regular work doesn't exceed 48 hours/week. One day off in every 7-day period.
- Voluntary overtime is limited to 12 hours/week and compensated at a premium.

7. No Discrimination

• Equal treatment regardless of race, gender, religion, etc., in all employment aspects.

8. Regular Employment

- Work is based on recognised employment relationships.
- Avoidance of obligations through subcontracting, excessive fixed-term contracts, etc., is prohibited.

9. Humane Treatment

- No physical, sexual, or verbal abuse or threats.
- This code sets minimum standards. Companies should exceed them and always comply with national laws, prioritising the stricter provision when there's overlap.

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Performance Measurement

To ensure the effectiveness and continual improvement of our Labour Standards Assurance System, Scala Surgical Ltd has integrated key performance objectives within our Quality Management System. This pivotal tool is overseen by the individual responsible for the Quality Management System and is readily accessible to all staff members involved in our designated supply chains. For further details on roles and responsibilities, please refer to LSAS 060 – Roles and Responsibilities.

Objectives and Targets

Non-Conformance

The number of Non-Conformances identified or reported within a 12-month calendar period resulting from status review, supplier appraisal, supplier audit, third party audit, internal audit, external audit, whistle-blowers or other means of communications, is to decrease year on year.

0 < 2	Excellent	- Performing well and allows for improvement		
3 < 5	Satisfactory	- Continual Improvement required		
5 <	Poor	- Requires constant monitoring, Corrective Action Planning and regular		
		- Status Review		

Goals

Scala Surgical Ltd is dedicated to upholding the highest standards of labour practices. As part of our commitment, we have set clear goals aligned with the NHS Supply Chain's Labour Standards Assurance System (LSAS) levels. Our roadmap for achieving these levels is as follows:

Level 1 - Foundation Level: Targeted attainment by 2022

Level 2 - Implementation Level: Targeted attainment by 2022

Level 3 - Established: Targeted attainment by 2024

Level 4 - Progressive: Targeted attainment by 2025

By setting these goals, we aim to demonstrate our unwavering commitment to ethical and responsible labour standards, ensuring that our practices align with the expectations and requirements of the NHS Supply Chain.

Contact Information

Please report any concerns you may have regarding Labour Standards violations to: LSAS@scalasurgical.co.uk

Date: 09.12.23 Next Review: 12.12.24

Haroon ibn Islam

LSAS Management Representative General Manager

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