Labour Standards Assurance Policy

& Management System

Uniphar Medtech is committed to our labour policy in-line with our legal and moral obligations. The standards are maintained within the Company itself and externally by the Suppliers and Service providers which form part of the Uniphar Medtech supply chain.

This policy applies to the following Uniphar Medtech business units:

Uniphar Medtech T/A Cardiac Services UK

1. Overview:

Uniphar Medtech is a leading European medical device distributor headquartered in Ireland, employing 377 people. Our people are at the heart of who we are. Together we represent a committed, highly trained and experienced group of professionals. We are a total healthcare solution provider offering best-in-class products and services for our customers. Uniphar Medtech comprises 10 brands across 15 European markets and is the medical device arm of the Uniphar Group.

Uniphar Medtech represent global leading medical device manufacturers across a multitude of specialities. Our people are at the heart of who we are and what we do. We train, we educate, and we support our customers through dedicated clinical specialists across Sales & Technical Service, Clinical IT, Clinical Applications, Training & Education and Customer Service.

We are more than a distributor; we are a total solutions provider. Our teams are supported by centralised functions across Quality and Compliance, Operational Excellence, Marketing, HR, and Finance.

Policy:

Uniphar Medtech's Labour Standard Policy is outlined within this Labour Standards Assurance Policy & Management System (LSAS). It applies to all employees (temporary and permanent), irrespective of length of service and includes clients and service personnel both inside and outside the work environment. This policy extends to any business partner within our supply chain.

A GDPR complaint version of this policy is made available publicly on our website:

www. cardiac-services.com

This policy applies to the following Uniphar Medtech business units:

Uniphar Medtech T/A Cardiac Services UK

Uniphar Medtech will ensure that this policy is communicated to all current and prospective employees, and all relevant who partner with Uniphar Medtech from a business perspective. Sufficient resources will be made available by Uniphar Medtech to ensure that LSAS is maintained and continually improved.

Uniphar Medtech has a zero tolerance policy to any form of human slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective

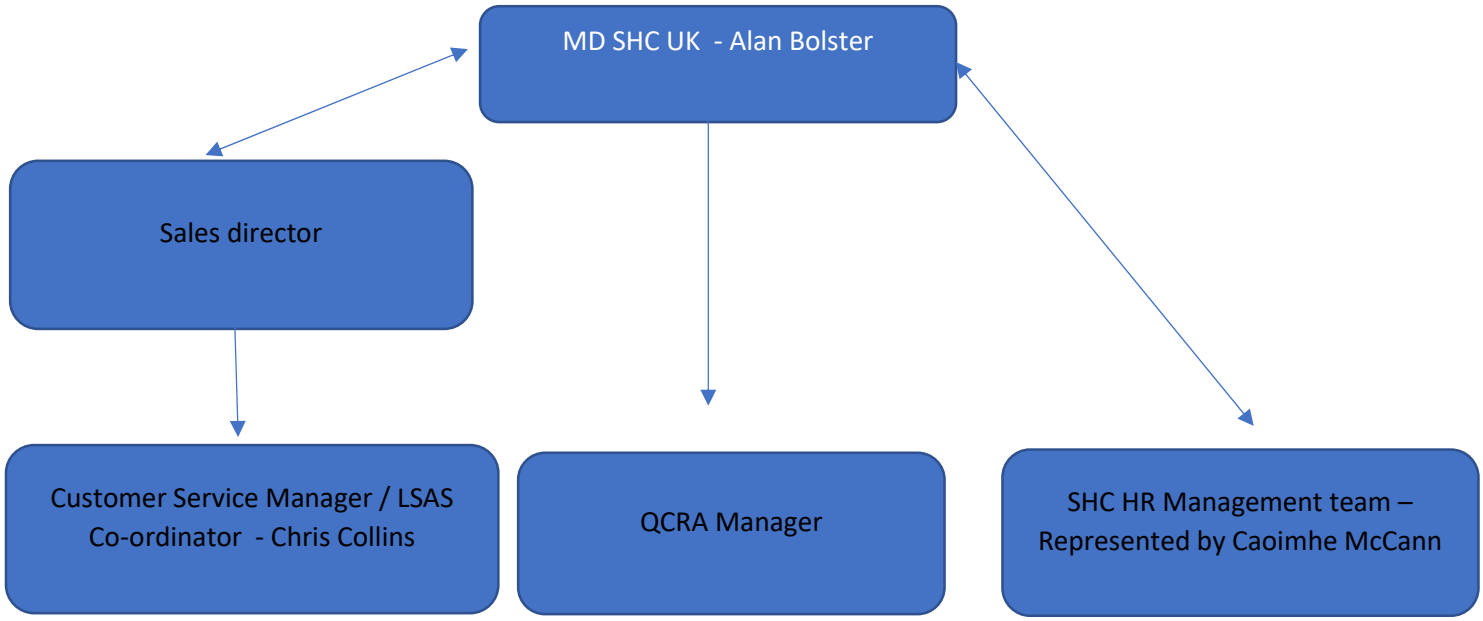
systems and controls in place to safeguard against any form of modern slavery taking place within our business or supply chain.

2. *Management Representative*

Section 6 is encompassed in this section.

The Uniphar Medtech T/A Cardiac Services UK appointed Management Representative for this Labour Standards Assurance Policy & Management System (LSAS) is a shared responsibility. Each of the below are responsible for the associated role / function relating to the management of LSAS:

Position of employee	***Role / Functions***
MD SHC UK	Review and endorse this policy Ensure the availability of adequate resources to achieve and improve LSAS To set and monitor objectives for the management and improvement of LSAS
Uniphar Medtech HR - Internal employees	Employee related employment and Labour Document and action any labour related issues
Sales director / LSAS Co-ordinator	Ensure new Vendors compliance
Uniphar Medtech QCRA Team	Maintain records of supplier LSAS Status. Carry out Supplier audits. Carry out internal audits. Communicate any LSAS related information during management review meetings Ensure that LSAS requirements are embedded in the QMS To create and issue training programs / arrange and co-ordinate training programs Completing risk assessments to determine the level of risks related to each supplier Ensure concerns and corrective actions raised against suppliers are addressed in a timely manner. To set and monitor objectives for the management and improvement of LSAS
Sales director / LSAS Co-Ordinator	Responsible for Implementation and Management of LSAS policy.



3. Labour standards status review

The Labour standards are assessed to determine which standards, such as the NHS LSAS and the Ethical Trading Initiative apply to Uniphar Medtech and any business partners within our supply chain.

These reviews are covered during audit and considered during any supplier risk assessments that may be carried out in this regard.

4. Legal and other requirements

It is a Uniphar Medtech requirement that :

- business unit comply with the relevant employment legislation within their own jurisdiction.
- We ensure that, wherever possible, applicable business partners adhere to the LSAS requirements and apply fair labour practice.
- Create internal awareness of the labour standards

The sources used to guide Uniphar Medtech in this regard are as below, and will be reviewed on an annual basis to ensure relevance:

- HSE guidelines (UK)
  www.hse.gov.uk
  HSA Guidelines (IRL)
  https://www.hsa.ie/eng/
  GDPR Compliance Checklist
  https://www.itgovernance.eu/en-ie/key-steps-to-gdpr-compliance-ie
  www.ethicaltrade.org

1. ETI Base Code (& overseas)
2. Labour Standards Assurance System
3. Safety Health and Welfare at Work Act 2005 (as amended)
4. Health and Safety at work act 1974 (as amended 2018)
4. Bribery Act 2010
5. Environmental Protection Act 1990
6. Equality Act 2010 (as amended 2012)
7. NHS Supply Chain - Supplier Code of Conduct
8. BMA Ethical Procurement for General Practitioners
9. UN's Universal Declaration of Human Rights
10. FCPA The Foreign Corrupt Practices Act of 1977
11. Health and Safety at Work (Northern Ireland) Order 1978 (and amendments)
12. Environmental Protection Agency Act 1992

Before any new supplier is approved, the following questions are asked as part of the Vendor Approval Process (ref Partner Data Gathering Form):

Does the company have a Code of Conduct or Ethics Policy? (If yes, please attach)
Does the company have a Sustainability or Labour Standards Policy? (if yes, please attach)

In addition to this, in 2021, a document for relevant suppliers was create: "Uniphar Medtech Supplier Questionnaire". The aim of this document is to get confirmation from the supplier that they comply with their national laws.

5. Objectives, Targets & Programmes

The Objectives have been set out as below. This table will be reviewed on an annual basis and updated to reflect the current status.

LSAS Specification	**Objective**	**KPI**	**Plan and Status (2022 /3)**
Policy	Maintain and review annually the objectives set out by Uniphar Medtech with regards to labour standards internally and across our business supply chain.	Annual policy review recorded	Policy on Internet. Official document. Status: Achieved – Ongoing
Legal and other requirements	To improve on current understanding of relevant employment legislation and ensure legal and other requirements are met.	Number of internal non-conformances raised from internal audits	Include relevant legal requirements with internal and external audits. Record the review of the requirements and ensure all relevant document (including policy) are updated. Status: In progress – Ongoing
Operational control	The processes, procedures, and systems the organisation has in place to manage labour standards through its direct operations (including both mitigating the risk of non-compliance and driving improvement).	Number of internal non-conformances raised from internal audits. No. of LSAS related risks in risk registers	Critical control points mapped Status – Ongoing
Performance Monitoring and Measuring	The collection of appropriate information in order to monitor and measure	Number of internal non-conformances raised from internal audits. Performance reports created and	LSAS included in internal audit schedule. External review to be arranged

	performance in relation to: Its stated objectives and targets Compliance with relevant legislation and any other requirements that it subscribes to Conformance to planned arrangements for labour standards assurance	communicated and CAPAS raised.	for +- March 2023. Review Objectives Status – Ongoing
Corrective Action	To ensure all CAPAs are recorded and actioned timeously. Risk is considered.	Number of CAPAs raised and close out time. Volume of risk assessments as a result of CAPA's	LSAS is a reason code in Navision Status – To Monitor
Competency, Training and Awareness	Improve awareness of LSAS requirements and issue required training	Training given to 100% of the relevant staff	Training issued in 2021. Update training and issue to new staff. Status: Achieved – Ongoing
Supply chain Management	Priorities the review of Laerdal. Request for information / documentation or audit of them and their supply chain to be escalated	Summary report on Laerdal and supplier review.	Laerdal supplier evaluation to be completed. Status – Ongoing

6. Roles and responsibilities

Covered in point 2.

7. Competence, Training and Awareness

LSAS awareness training is given to all relevant employees and records of the training are kept by HR. In line with standard training procedures, should the Policy or requirements be updated, updated training / awareness will be issued to all employees.

Awareness of Uniphar Medtech Labour Standards requirements is communicated with the relevant business partners if requested.

Business Ethics / Compliance training is given to all employees on an annual basis.

8. Communications

We have a number of policies to ensure that we are conducting our business with integrity and transparency including our Protected Disclosures Policy. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery / a break in the required Labour Standards of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Internal concerns regarding Labour practices would be raised and addressed with our HR Department.

Employees are encouraged to report any concerns to HR, including:

- Inappropriate relationships with suppliers
- Failure to comply with a legal obligation
- A danger of health and safety of an individual
- Corruption
- Bribery

Concerns can also be raised directly to our confidential hotline (Navex Global), full details of which are contained within our Protected Disclosures policy.

Concerns regarding any supply chain business partners can be raised at QCRA@unipharmedtech.com

Communication between ourselves and any interested parties within our supply chain, will be done via email. Copies of all correspondence will be kept on record as per our standard Document retention policy. Should communications covering any concerns regarding Labour Standards be discussed verbally during a meeting, minutes of the meeting are to be kept for reference.

This policy is stored on the company Intranet folder and is available to all employees.

9. Documents and Records

All official documents are entered into our QMS and managed through our document control module within Q-Pulse. This records change control.

Document type	Storage method	Retention period
Supplier approval forms	Electronic	As long as supplier is on ASL plus 10 years
Non-conformance records	Electronic	6 years
Internal audit reports	Electronic	6 years
External audit reports	Electronic	6 years
Internal employee records	Electronic	Various as per document retention policy
Tender documents with ref to Labour requirements	Electronic	7 years
Policy documents	Electronic	5 years
Supplier risk assessments	Electronic	5 years

10. Operational Control

Uniphar Medtech have identified the below as operation control points with regards to Labour Standards:

Internal	**External**
Hiring new staff	Approving new vendors / business partners
Employee awareness of labour / employment rights	Non-conformance management
HR Department dedicated to ensuring employees continue to work in a company that not only adheres to all labour standards but values the safety and welfare of all employees.	Audits
Non-conformance management	Risk assessments
Audits	
Risk assessments	

11. Supply Chain management

Supply chain management starts with the approval of our Suppliers.

Sales teams that are responsible for sourcing new suppliers are aware of the requirements to only deal with ethical companies which adhere to good labour practices.

Vendor approval is done in accordance with SOP SOPSH-P-1 – Vendor approval and management. As detailed in Partner Data Gathering form, each new vendor is asked to confirm if they adhere to local / National Labour laws.

Before any product is supplied to the NHS, the vendor must complete the supplier assessment form and is added to the LSAS audit register.

The country of origin of each supplier is recorded.

12. Emergency and Critical Issue Response

All internal issues will be dealt with by the Uniphar Medtech HR department and includes the implementation of the Modern Slavery's act document and Protected Disclosures Policy.

Should Uniphar Medtech become aware of any breach in labour laws & standards from any of our business partners, the following actions will be taken, as applicable:

- Business partner communicated in writing and a formal response requested
- Record as non-conformance

- Review ETI base code corrective action for guidance on whether the breach is major or minor
- Risk assessment carried out – based on risk, trade with the business partner may be suspended. They may be removed from the approved supplier list
- Notify the relevant national enforcement office to intervene.

13. Performance Measuring and Monitoring

The objectives will be reviewed as per the KPI's laid out in section 5 of this document. This will include the below:

Internal performance monitoring	External / Supplier performance monitoring
Audit reports / CAPA's	Audit report / CAPA's
HR report / internal employee records	Number of Risk assessments carried out and their results
Number of internal trainings given – LSAS related	
SGS external audit reports	

14. Corrective action

CAPAS are currently recorded in each business units individual Quality records. Any Corrective actions relating to suppliers, will be noted in the annual supplier assessment and reviewed at the Management review.

All CAPAS will be communicated with the relevant party. Any internal CAPA's will be communicate with the HR Manager. Supplier CAPA's, once agreed and communicated with a supplier, will be closed off in a timely manner, with supporting evidence and a root cause established:

Major Non-Conformance: Action - Immediate to One Month (dependent on criticality). In severe cases, trade with a supplier may be suspended until corrective measure are taken.
Minor Non-Conformance: Action - Within Three Months
Observations: Action - Dependent on issue. Some may not require close out.

15. Management Review

During the Annual QMS / BMS Management Review, LSAS requirements and compliance are discussed and recorded to ensure that the policy is being adhered, requirements are being met and continual improvement with regards to meeting LSAS is considered.

Approved by:

Name: Alan Bolster
Signature: Date: 18/10/23
Title: MD Murphy Architect GB

Name: Chris Collins
Signature: C. Collins Date: 21/6/23
Title: OFFICE MANAGER

Name: Caoimhe McCann
Signature: Date: 21/06/2023
Title: Senior HR Manager

Name: Candice O'Toole
Signature: Date:01/03/2023
Title: QCRA Manager