



# HEELEY SURGICAL LTD

Manufacturer of Surgical Instruments  
*Quality without compromise*

## LSAS Policy

Heeley Surgical is committed to working with its suppliers to achieve high social, ethical and environmental standards within its business and throughout its supply chain. In order to achieve, and continually improve these high standards, Heeley Surgical has developed an Ethical Trading Policy based on the internationally recognised ETI Base Code and will ensure that this is effectively implemented according to the Principles of Implementation below.

In order to ensure Heeley Surgical remains up to date with relevant legislation within its suppliers country of origin it has subscribed to Social Accountability International, Business & Human Rights Resource Centre, and IMPACT who provide both daily and weekly newfeeds regarding human rights, labour, environment and anti-corruption legislation, and all who seek to improve international labour conditions.

Heeley Surgical 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. Heeley Surgical is committed to working with its suppliers in order 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 sub-contracting 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.

Heeley Surgical requires written confirmation of acknowledgment from all suppliers that the following standards will be met. Please sign and date below and return to Alan Heeley at [alan@heeleysurgical.com](mailto:alan@heeleysurgical.com)

- Employment Is Freely Chosen

The company will not make any use of forced labour, including prison or debt-bondage labour (ILO Declaration on Fundamental Principles and Rights at Work, 1998). Workers are not required to lodge 'deposits' or their identity papers with their employer, and are free to leave their employer after reasonable notice.

- Freedom Of Association & The Right To Collective Bargaining

Workers, without distinction, have the right to join or form trade unions of their own choosing, and are able to bargain collectively (International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, 1998).

The employer must hold an open attitude towards the activities of trade unions and their organisational activities. Worker's representatives are not to be discriminated against and have access to carry out their representative functions in the workplace.

Under legally restricted circumstances of collective bargaining and freedom of association the employer is to facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

- Working Conditions

The company will provide a safe and healthy working environment, and will take all reasonable steps to prevent accidents, injury and death in the working environment.

All workers shall receive regular and recorded health and safety training.

The company will provide access to clean toilet facilities and to portable water, and if appropriate, sanitary facilities for food storage shall be provided.

Accommodation where provided, shall be clean, safe and meet the basic needs of the workers.

- Child Labour

The company will not employ workers under the legal minimum working age stipulated by the laws governing their country. Where young workers are employed (16-18), they will not work at night or in hazardous conditions (ILO Declaration on Fundamental Principles and Rights at Work, 1998).

- Living Wages Are Paid

Wages and benefits paid for a standard working week meet national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs, and to provide some discretionary income.

All workers are to be provided with written and understandable information about their employment conditions in respect to wages before they enter employment.

Deductions from wages as a disciplinary measure shall not be permitted, nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned.

- Working Hours Are Not Excessive

Working hours comply with national laws and benchmark industry standards, whichever affords greater protection. Workers shall not on a regular basis be required to work excessive hours, 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.

- Discipline

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.

- Bribery

The company shall comply with national bribery standards, The Bribery Act 2010 and anti-corruption laws, and will not offer gifts, services or other benefits to influence customers. Employees of the company will not accept such benefits in return for favouring individual suppliers when placing purchase orders.

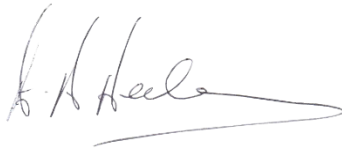
- Environment

The company will comply with all applicable environmental laws, regulations and standards.

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

- Dedicate ownership of the Policy to a management representative (Alan Heeley) 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 Heeley Surgical'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 Heeley Surgical signed acknowledgment from those who constitute Heeley Surgical's Tier 2 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 in a responsible way with suppliers demonstrating persistent disregard for the Policy, considering the impact this may have on the workers and communities in which the supplier operates.

Please do not hesitate to contact Alan Heeley on 0044 (0)114 220 2272, or [alan@heeleysurgical.com](mailto:alan@heeleysurgical.com) if you have any questions or concerns regarding labour standards, or a non-compliance issue.



Approved by:

Alan Heeley  
Managing Director

I ..... of ..... (supplier to Heeley Surgical Ltd) hereby sign and return this policy to confirm that I have read and agreed to the policy.

Sign:

Date: