

LABOUR STANDARDS ASSURANCE SYSTEM POLICY

International labour standards have grown into a comprehensive system of instruments on work and social policy, backed by a supervisory system designed to address all sorts of problems in their application at the national level. They are the legal component in the ILO's strategy for governing globalisation, promoting sustainable development, eradicating poverty, and ensuring that people can work in dignity and safety.

*International Labour Standard:
Rules of the Game for the Global Economy*

1. Policy

Policy Statement

RICHARDSON HEALTHCARE Ltd. is committed to responsible business conduct among its facilities, suppliers, and contractors that meet or go beyond applicable laws and regulations, safeguards health and safety at work, protect the environment and supports the contribution of business to achieving sustainable development.

Purpose of the Policy

The purpose of this Policy is to implement and follow the standards set internationally to address issues in relation to legal obligations of employment contracts and is a guide to establish the payment, working hours, labour rights for the employees at RICHARDSON HEALTHCARE Ltd. and across the Supply Chain.

This policy developed in order to meet the guidelines and standards established by the United Kingdom Labour Law, WTO, ILO, NHS Supply Chain Code of Conduct and SA2008. All these strategic frameworks provide a guideline on the legal relationship between workers, trade unions, and protecting labour laws across the whole of the supply chain in the UK and outside the UK.

Having a truly global Supply Chain, we believe that achieving the goal of decent work in the globalised economy requires actions at the international level. Furthermore, this Policy is relevant to the Company itself, our contractors, sub-contractors, suppliers, and other parties engaged in the Company's business.

To be a part of the world community, RICHARDSON HEALTHCARE Ltd. is responding to this challenge by operating with international legal instruments on trade, finance, environment, personal data protection, human rights, and labour. International labour standards, therefore, lay down the basic minimum social standards agreed upon by all players in the global economy.

RICHARDSON HEALTHCARE Ltd. has developed this Policy to allow and reflect on the core standards described by the law and embed these under the LSAS Policy.

This includes:

- 1. Employment policy (Payments, working hours, protected pay redundancy, employment rights absence and sickness)*
- 2. Child labour/forced labour*
- 3. Collective bargain*
- 4. Gifts/ Negotiations/Bribery*
- 5. Health and safety*
- 6. Environment*
- 7. Business continuity actions*
- 8. Business partner relationship policy/ Supply Chain Management*
- 9. Equality and diversity*
- 10. Personal Data Protection*

In combination with a set of defined rights and rules, functioning legal institutions can help formalise the economy and create a climate of trust and order which is essential for economic growth and development.

Policy Commitment

This policy is relevant to RICHARDSON HEALTHCARE's organisational functions, its activities with subcontractors, suppliers, distribution centre and all others involved in the business supply chain.

RICHARDSON HEALTHCARE Ltd believes that human rights, which includes freedom from slavery and human trafficking, are an absolute and universal requirement and as such are committed to upholding those rights as expressed in the *International Bill of Human Rights* and the *International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work*.

Current Policy will provide a framework to ensure work standards are maintained, keeping employees at the centre of the business to reflect an overall vision, avoid any abuse of the employment law and conduct, and therefore, provide a safe environment and practices in all our business delivery activities. We contribute to this legal framework by promoting international labour standards aimed at making sure that economic growth and development go along with the creation of decent work.

Review

The Policy will be reviewed periodically and, it is subject to revision to align with any changes to laws or directives within the UK and all the other countries where Richardson Healthcare Supply Chain operate as a direct or sub-contracting function. The Company shall take into consideration: changes in legislation, legal advice as necessary and any other requirements to which the Company subscribes, to ensure the adequacy, suitability and continuing effectiveness of current Policy.

In the first instance, this Policy will communicate to RICHARDSON HEALTHCARE's employees through the HR service (<https://yourhrservices.co.uk/richardson/index.php>) as well as will be publicly available via our website: (<http://www.richardsonhealthcare.com/>), and also Company will actively distribute this Policy across all contractors, subcontractors, and suppliers.

The Richardson Healthcare Data Protection Policy under the Data Protection Act 2018 and EU General Data Protection Regulation (GDPR) in respect of the data privacy and security has communicated to Richardson Healthcare's employees through the HR



service (<https://yourhrservices.co.uk/richardson/index.php>) as well as will be publicly available via our website: (<http://www.richardsonhealthcare.com/>), and also Company will actively distribute the GDPR Policy across all subcontractors, suppliers and customers.

Scope of Policy

RICHARDSON HEALTHCARE Ltd. Labour Standards Assurance Policy applies to the all products and specifically to all the products supplied to NHS Supply Chain via the following Framework Agreements:

- **Procedure Packs: 2015/S 127-232118**
- **General Wound Care: 2016/S 246-450224**

The Policy is applied to all the operations carried out by RICHARDSON HEALTHCARE Ltd. These measurements include the impact of Policy to all the functions and over activities carried out directly or by any supply chain members at RICHARDSON HEALTHCARE Ltd.

Consequently, this Policy is established to ensure the labour standards are reflected in all the business processes including all the supply chain members from the raw material sourcing until the product is delivered to end user. Currently, this Policy will frame the employment rights and conditions which can be discussed and agreed on recruitment stage of the employment process as well as the procurement or outsourcing activity.

Nature and Scale

The Policy is structured and implemented as appropriate to the nature and scale of RICHARDSON HEALTHCARE Ltd. and in line with its status, as defined by the EU law, the UK law as a private Ltd company essentially providing a range of Medical Device products to Health and Care Industry.

Resources Allocation

To implement the Policy on minimum standards of working, RICHARDSON HEALTHCARE Ltd. has designated the Regulatory Affairs Officer to develop and implement the Labour Policy. RICHARDSON HEALTHCARE Ltd. has also made arrangements for the external auditor to advise on the Policy and identify areas of improvements. These elements/resources are translated in the budget stream and allocated adequate budget.

2. Management Representative

Terms of Reference:

All the Richardson Healthcare policies are reviewed twice a year in Management review meeting by the Managing Director and the Operations Team to see if policies are fit for

objectives, meeting its target and contributing to the improved outcome in business functions.

To address the needs of initial development of the LSAS Policy, there a group including the Managing Director and the Regulatory Affairs Officer will establish, who will regularly monitor the labour system implementation for it is smooth running.

Roles and Responsibility

- Management has identified a dedicated team comprising of the Managing Director and the Regulatory Affairs Officer. The Policy will be reviewed internally for identifying issues and actions indicated from LSAS Performance Framework. Furthermore, this report and the Policy documents will be presented to board members.
- The Managing Director is committed to review, audit and continuously improve on working standards across the organisation as well as to allocate the resources for the implementation of the Policy.
- The Regulatory Affairs Officer is responsible to continuously review the standards, subscribe to the International and Local forums, attend updates and training, review the framework, and communicate with all the members of supply chain. Acting as a Authorised Data Protection Manager to provide support in certain situations or undertake an investigations, meetings or other related RHL activities regarding GDPR.
- The Operation Manager is responsible in operational planning and control of productivity and efficiency of processes; management and internal training; monitor of processes effectiveness in accordance with the current Policy.

- The Policy implementation is also audited by the external auditors on annual basis. The report of the audit would be presented to the Managing Director, and then be discussed by Operations team to identify gaps and improve the processes.

Schedule for Policy Review

This Policy designed as being “up-to-date” with implementing a standard review mechanism of ensuring that the relevant standards are up-to-date that responds to the needs of the world of work, the protection of workers and promotion of sustainable enterprises.

Standard review plan:

<i>Presenting the item on board meetings agenda</i>	<i>Yearly</i>
<i>Presenting the auditor’s report</i>	<i>Annually</i>
<i>Presenting the report to the Managing Director</i>	<i>Annually</i>

Enforcement of the policy

To reflect and ensure our commitment to Labour Law this Policy implemented across all the activities of RICHARDSON HEALTHCARE Ltd. including Supply Chain and sourcing bodies.

We believe that these Labour Standards can be used to improve various administrative structures such as labour administration, labour inspection, social security administration, employment services, and so on. Standards can also serve as a source of good industrial relations applied by labour dispute resolution bodies, and as a model for the collective agreement. Consequently, RICHARDSON HEALTHCARE Ltd. is actively promoting this Policy through whole Supply Chain to agree with all the suppliers and contractors working with us.

The implementation of this Policy is further confirmed by conformance of the Supply Chain members and identify any potential or existing Labour Standards issues through the compliance to Supply Chain Registration form before signing up or reviewing the extension of the new/ existing contracts.

3. Labour Standards Status Review

To ensure that minimum Labour Standards followed RICHARDSON HEALTHCARE Ltd. has established and maintained an Action Plan to review Labour Standards and guarantee the quality implementation of these standards to its functions and for the Supply Chain partners. This will cover minimum wage, eligible age at employment, working hours, payment process and cover for holidays and sickness. This action plan will review annually.

Action Plan 2018 - 2019:

Objective	Minimum standards	Richardson Healthcare Ltd activity for Assurance	Evidence
Employment standards are maintained	Minimum wage is provided to the workers across all business activities (Ref: National living wage (NLW), Department for Business, Energy and Industrial Strategy, the UK).	The company's payslips will reflect the basic pay, allowances and deductions.	Ref: Employment Policy (www.yourhrserves.co.uk), Pay slips, Employment contract; Employment Handbook (RHC1805); Ethical Procurement Policy (RHC1796)
	Working hours are restricted to the ILO standards.	The contracted hours will be mutually agreed between Richardson Healthcare and employee from employment contract. The contract will be mutually agreed and signed.	Ref: Employment Policy, Employment contract; Employment Handbook (RHC1805); Ethical Procurement Policy (RHC1796)
	Minimum age is considered for	For example, for the UK you must be at least:	

	<p>employment</p> <p>Staff absence: all staff are protected for sickness, maternity/paternity/adopti on holidays and annual leave, or parental leave.</p>	<ul style="list-style-type: none"> ➤ <u>school leaving age</u> to get the National Minimum Wage. ➤ aged 25 to get the National Living Wage - the minimum wage will still apply for workers aged 24 and under <p>Staff will have the protected time clearly mentioned in the contract. The partners will be informed of public holidays and expected closure of business activities.</p>	<p>Ref: Employment Contract, Employment Handbook (RHC1805); Ethical Procurement Policy (RHC1796)</p>
<p>Responsibly delivering activities considering ethics for working conditions</p>	<p>Maintaining Equality of opportunity.</p> <p>Richardson Healthcare Ltd is against child or forced labour and avoids business with companies suspected to be involved in forced/child labour.</p> <p>Establishing health and safety of employees.</p>	<p>Establish Equality and Diversity policy.</p> <p>Richardson Healthcare Ltd check documents before signing agreements and will visit companies periodically</p> <p>Have a Policy of Health and Safety and cover employer liability insurance.</p>	<p>Ref: Equality and Diversity Policy (RHC1798); Equal Opportunity Policy (RHC1799); Employment Handbook (RHC1805); Ethical Procurement Policy (RHC1796)</p> <p>Ref: Health and Safety Policy (RHC1811)</p> <p>Ref: Supply Chain Management Policy (RHC1797); Ethical Procurement Policy (RHC1796); Supplier Approved Form.</p>

	<u>Established Data Protection Policy</u>	Richardson Healthcare is intended to comply with its obligations under the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR) in respect of data privacy and security. It is intended that this policy is fully compliant with the 2018 Act and the GDPR.	Ref: Data Protection Policy is publicly available within the company website (HR service).
Establish Collective Bargain	Richardson Healthcare Ltd will not discriminate the political affiliation or connection with the Trade Union of any employee	Establish Trade Union affiliation element in Employment policy.	Ref: Employment Policy; Employment Handbook (RHC1805); Ethical Procurement Policy (RHC1796)
Corporate responsibility (Social and Sustainability elements)	Ensure to maintain Trade Standards. Ensure to maintain Environmental friendly practices.	Establish Customer Care Policy, Employment Policy, and Labour Assurance Standard Policy. Richardson Healthcare Ltd has Environmental Policy and practice recycling, minimum paper based communication.	Ref: LSAS Policy (RHC1794), Customer Care Policy (RHC1801) and Employment Policy. Ref: Environmental Policy (RHC1174); Sustainability Report (RHC1168); Key Performance Indicator KPI's (RHC1170)
Working with business	To maintain the relationship with other	All business will have formal contracts to sign. For	Ref: Distributors Vetting Form

partners	businesses and Supply Chain.	example: Supplier Registration Forms, Supplier Framework agreement/subcontractors/ consortia formation.	Supply chain management documents
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4. Legal and Other Requirements

Compliance of Policy

RICHARDSON HEALTHCARE Ltd. subscribed to various forums and organisations providing guidance on Labour Standards and relevant directives (e.g. www.gov.uk; www.ilo.org). We have third party reviewers from external auditors to audit and certify the activities in line with the Labour Standards adopted by the organisation and developed with an intention to reflect compliance with WTO, ILO, EU and the UK Directives.

This Policy is intended to ensure our Supply Chain partners maintain these standards. The high core standards reflect the guidance from following acts to ensure our commitment and compliance with the legislations:

- National Minimum Wage Act 1998 (revisions incorporated for 2015), [response to the Low Pay Commission's 2013 report](#)
- Working Time Regulations 1998, Employment Rights Act 1996. Ref: <http://www.legislation.gov.uk/ukpga/1998/39/contents>
- Transfer of Undertakings (Protection of Employment) Regulations 2006, Pension Act 2004
- Health and Safety Act 1974
- Minimum Age Convention, 1973 (No.138)
- Equality Act 2010
- UN Declaration of Human Rights.
- Employment Act 2008
- Bribery Act 2010
- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No.87)
- Right to Organise and Collective Bargaining Convention, 1949 (No.98)
- Forced Labour Convention, 1930 (No.29)
- Abolition of Forced Labour Convention, 1957 (No.105)

- Worst Forms of Child Labour Convention, 1999 (No.182)
- Equal Remuneration Convention, 1951 (No.100)
- Discrimination (Employment and Occupation) Convention, 1958 (No.111)
- Ethical Procurement Labour Standards Policy, RHC1796 (Richardson Healthcare Ltd)
- LSAS Attached as supporting documents.
- LSAS NHS Supply Chain Assurance standards.

5. Objectives, Targets and Programme

RICHARDSON HEALTHCARE Ltd. in recognition of the potential Labour issues has assigned Objectives, Targets and Programme (Labour Standards Assurance Programme, RHC1795) to ensure safe delivery and compliance with Labour Assurance Framework.

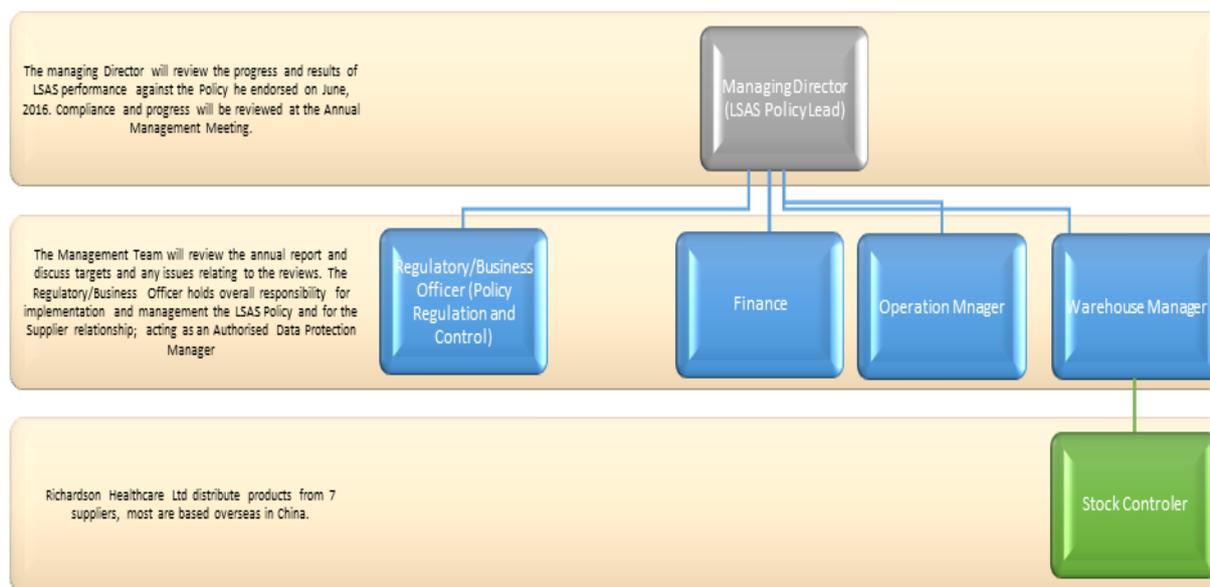
Labour Assurance Framework

Objective	Target	Programme
Ensure Employment contracts and supply chain members complies with minimum labour standards or working arrangements	<ul style="list-style-type: none"> ➤ Issue of working hours: Staff working hours should not be more than maximum working hours identified in the law, including staff breaks. ➤ Issue of minimum wage: The wage of staff will reflect the minimum wage set by the law. Richardson Healthcare will formalise per hour rate/ annual salary. 	<p>Contracts to be reviewed and updated regularly.</p> <p>Subscription and review ILO website for the country reports as well as the National living wage (NLW), Department for Business, Energy and Industrial Strategy, the UK website.</p>
Ensure Equality and Diversity is practiced in all business functions	To have Equal Opportunity Policy in place to ensure, equal opportunities are given to all regardless of sex, gender, religion, age or disability.	<p>To meet the requirements of disability we have identified that we need to acquire equipment to support this.</p> <p>The salaries should be standardised for all.</p>

<p>To ensure Health and Safety of all the employees on site and in Supply Chain.</p>	<ul style="list-style-type: none"> ➤ Our Health and Safety Policy addresses this and other related issues in health and safety in detail. This Policy should be available to all members of staff ➤ Ensure health and safety is ensured all through the Supply Chain. 	<p>Access to Health and Safety Policy and Supply Chain Self-Assessment Form.</p> <p>Ensure that all employees are trained for health and safety, training records are maintained, fire and safety training is provided in line to up to date laws, for any directly or indirect workers i.e. ensure all supply chain members have Health and Safety Policy.</p>
<p>Training and development to implement Labour Standards</p>	<p>To ensure for the implementation of the Policy there is a training programme identified.</p>	<p>the Policy lead will attend the courses offered from ETI, and other Total Quality Management forums to improve the systems and structures as arising from policy.</p>

6. Roles and Responsibilities

The Management Representative (Policy Lead) for the Labour Standards Assurance System (LSAS) is the Managing Director. This position has full responsibility and authority for LSAS establishment, implementation, maintenance and ongoing continual improvement.



The definition of the roles:

The Managing Director of RICHARDSON HEALTHCARE Ltd. is accountable for Labour Standards Assurance Policy (RHC1794).

The Regulatory Affairs Officer is responsible for establishing, reviewing, implementing and disseminating the Labour Standards Assurance Policy to all the employees and stakeholders. The Regulatory Affairs Officer is responsible for creating reports for the Managing Director.

Third Party Auditors:

The third-party auditor will be invited and assigned to review, evaluate and monitor the Policies from Richardson Healthcare Ltd and certify for levels achieved under LSAS Framework for NHS Supply Chain.

7. Competence, Training and Awareness

To implement the policy Richardson Healthcare Ltd has identified the criteria for a lead to be aware of Total Quality Management, Labour Laws in the UK, China, and Europe and have relevant qualification and experience of dealing with issues related to conformance and regulatory or statutory affairs.

The RICHARDSON HEALTHCARE Ltd. has identified the lead for the development and implementation of Labour Standards Assurance Policy. As a representative from the company this person has received the communication and initial awareness training delivered by NHS supply chain and read through all the relevant guidance and legislations. For continuous improvement, the individuals involved in the process for implementing the Policy shall attend the formal training, attend seminars and conferences to maintain the knowledge on the matter.

The audit will be done by a certified and approved auditor for policy compliance.

8. Communications

Accessibility to Policy:

The Policy introduced at the time of staff induction, Intranet, and other employee's resources. This Policy must regularly share with stakeholders, and there is a formal process for engagement and access to our Policy through regular exchange of emails, meetings and at the time of registering suppliers or reviewing of the contractor signing new contracts.

There is a formal procedure for communication for LSAS in RICHARDSON HEALTHCARE Ltd.

The pathway guided through the processes:

1. All Labour standards related documents are to be reviewed by the Managing Director. However, the Regulatory Affairs Officer is responsible for communicating for any new initiatives, directives or law that impact on Labour Standards Assurance. These actions will deliver in meetings or emails.
2. Any issue highlighted in Supply Chain should be documented, resolved and shared at the board meeting, with a separate action log and meeting with the stakeholders. For any emergency or unforeseen situations, the company will follow communication strategy.
3. All Policies and update related to LSAS to be made available to all employees and the stakeholders, this should be communicated to the employees in the supply chains as well through their relevant employer.
4. Any complaints and whistle blowing needs to addressed to the Managing Director, and the Regulatory Affairs Officer of RICHARDSON HEALTHCARE Ltd., the contact number of both should mention in the relevant Policies.

9. Documentation and Records

All documents are controlled for any amendments and revisions and follow the Corporate Coding for tracking and referencing purpose. Any change is legislation aligned and embed in relevant Policies and documentation on the version control document to carry impact assessment if required. The LSAS Policy is established in line with National and International Labour Standards and reviewed regularly. This Policy shared with the suppliers, and other Supply Chain members.

10. Operational Control

From the detailed Risk Assessment and Labour Standard review RICHARDSON HEALTHCARE Ltd. has identified the following Critical Control Points (CCP):

1. *All the employees will have formal contracts.*
2. *All the suppliers will provide complete documentation on their operations related to labour issues.*
3. *All the employees joining RICHARDSON HEALTHCARE Ltd. would have to complete all mandatory trainings and read through all relevant Policies.*
4. *Any issues related to Labour Standard can also be posted directly to the Managing Director by email.*
5. *The Policy Lead should have formal training to implement LSAS.*

Business Continuity and Risk Strategy

To ensure all the core standards defined in the Policies are met and implemented without any distraction RICHARDSON HEALTHCARE Ltd. has mapped the LSAS Policy elements in line with 15 domains defined under LSAS framework to identify the risk, Operational controls and ensure a Business Continuity Plan. These risks also assessed about the Labour Standards risks in the Supply Chain as defined in references to the listed documents and guidance:

- www.labourunity.org
- EU law of minimum wage
- Blogs.wsj.com
- www.chinalabourwatch.org
- http://www.ilo.org/ilc/ILCSessions/102/media-centre/news/WCMS_216506/lang--en/index.htm
- <http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:1:0::NO>
- <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

The Supply Chain for RICHARDSON HEALTHCARE Ltd. is comprising of 7 suppliers, 2 of the providers are sub-contracting.

Once the goods manufactured, all consignments are sterilised and packed in China and delivered to the Bibby Distributions Ltd, a storage and logistic provider for RICHARDSON HEALTHCARE Ltd. The goods are stored, picked and distributed to the customer or end user through electronic ordering and processing system.

This supply chain is assessed broadly under two categories:

1. Internal/ Corporate risks (change in policy, inability to review/ implement Policy due to resources)
2. External Influences (Influence of International Law or practice eg. EU)

There are Critical Control Points identified as below to assess any risks in relation to the LSAS standards, this is detailed in the risk register.

The Critical Points includes:

1. Registration of new distributor
2. Supplier Self-Assessment Form
3. Identifying non-conformance and agreeing on corrective actions
4. External verifications of suppliers
5. Continuous review of Labour Standards for Supply Chain about any changes.

11. Supply Chain Management

The supply chain for sourcing Richardson Healthcare products explained in the Supply Chain map attached (Ref: Supply Chain Management Policy). There are seven suppliers from China, and two of those have subcontractors. The range of products includes Sterile Dressings and Procedure Packs. All the providers are formally contracted by Richardson Healthcare Ltd to manufacture their brand. Orders are processed by the suppliers, with products produced according to agreed technical specifications. Completed orders are shipped directly into Richardson Healthcare distributions centre (Bibby Distribution Ltd).

Customer orders are sent to Bibby Distribution Ltd electronically on a daily basis. They will take and dispatch accordingly to the orders through the distribution chain. Each shipment accompanied by a relevant paperwork.

Strength of Supply chain:

All the suppliers are performing the functions in China comply with ILO directives and the EU law for labour standards.

1. All our suppliers are vetted and have good working relationship with us for many years.
2. All the suppliers are experts in their field.
3. All the suppliers provide us the goods in time.
4. All providers communicate in English.

12. Emergency / Critical Issue Response

Planned mitigation actions and review of these activities formalised through risk review process defined above. In the case of emergency, Richardson Healthcare Ltd has established a Business Continuity Plan. This Plan identifies the procedure to deal with such circumstances.

The point of contact in case of emergency will be:

Contact Person: Valeria Till

Email: info@richardsonhealthcare.com

Contact No.: 44 (0)800 170 11 26

13. Performance Monitoring and Measurement

RICHARDSON HEALTHCARE Ltd. periodically reviews this Policy to improve continually, taking into consideration changes in legislation, and any other requirements to which the Company subscribes, and in to ensure the adequacy, suitability and continuing effectiveness of the policy.

The Managing Director is the Lead for the Policy who responsible to ensure the LSAS Policy is up to date and complies with the relevant Labours Laws such our employment standards, ethics, and Human Rights. The process aligned below ensures the Policy is embedded and reflects in business functions includes:

1. *All essential human right and employment legislation reviewed in every six months.*
2. *The organisation subscribed to Business links: WTO, ETI and ILO.*
3. *Any updates or new initiatives added to the Policy after formal consultation and review that is approved by the board.*
4. *The Policy circulated, read and understood by all policy leads, and relevant stakeholders and suppliers.*

The performance to Labour standards is measured through:

1. Supplier Self-Assessment Form (applies for a new supplier/ distributor or in case if any change to legislation, law, changes that can risk due to the country of origin).
2. Review of LSAS framework on an annual basis.

14. Corrective Action

This Corrective Action Procedure should read in-conjunction with our Quality Management System processes. (Ref: SOP 141 "Preventive & Corrective Action Procedure" and SOP 130 "Control of Non-Conforming Procedure"), which have been established to manage actual and potential non-conformances to our standards including corrective and preventive action (Ref: SOP 141 "Preventive and Corrective Action Procedure").

Any actions taken shall record in the Corrective Action Report (Ref: Form F014).

Any issues noted relating to our suppliers or other parties will be addressed in section 11 above relating to Supply Chain Management. In those situations, corrective actions shall record on the Corrective Action Report (Ref: Form F014).

As with our Quality Management System, once a corrective and preventive action has agreed, time scales and responsibilities shall be defined:

- Major Non-Conformance: Action - Immediate to One Month (dependent on criticality)
- Minor Non-Conformance: Action - No more than Three Months
- Observations for Improvement: Action - Dependent on the issue, all outcomes will be recorded.

The company shall wherever practicable identify the root cause of any issues of non-conformities raised (Ref: Root Cause Analysis RHC1800).

15. Management Review

The Organisation has identified a formal system to involve the top management in review and approval of the Policy as explained regarding reference.

The recent review of this policy has identified the following strengths:

1. The Policies are developed in relevance to minimum labour standards and reflect the outline of rules described in national and international laws.
2. The Policies will help to define the formalising the business activities when working with partners or suppliers across geographic boundaries or establishing future business units in various parts of the world.
3. The Policy has identified that RICHARDSON HEALTHCARE Ltd. recognises the responsibility towards community, environment and working conditions and is prepared to follow best practices on enterprises.

References

1. <http://www.ilo.org/global/publications/lang--en/index.htm>
2. <http://www.ilo.org/global/standards/applying-and-promoting-international-labour-standards/lang--en/index.htm>
3. <http://www.ilo.org/safework/>
4. Rules of the games: http://www.ilo.org/global/publications/WCMS_108393/lang--zh/index.htm
5. Trade and Labour Standards: http://www.wto.org/english/thewto_e/minist_e/min99_e/english/about_e/18lab_e.htm
6. Employment terms and conditions: <http://www.direct.gov.uk/en/Employment/Employees/index.htm>
7. http://www.britishlaw.org.uk/cit_emp.html
8. NHS supply chain code of conduct: http://www.supplychain.nhs.uk/~/_/media/Files/Misc/NHS%20Supply%20Chain%20Supplier%20Code%20of%20Conduct.ashx
9. Social Accountability Standard (SAS) 2008: <http://www.sai-intl.org/index.cfm?fuseaction=Page.ViewPage&PageID=937>
10. EU Employment Law: <http://www.londonchamber.co.uk/DocImages/1154.pdf>

11. Public holidays in Germany: <http://www.dipinfo.ru/eng/gk/germany/germanyholidays>
12. Public Holidays in France: http://www.french-property.com/reference/french_public_holidays.htm
13. Holidays World-wide: <https://www.timeanddate.com>
14. Equality Act 2010: www.direct.gov.uk/en
15. General Data Protection Regulation (GDPR) <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

Document review/ version update	Description	Timescale for next scheduled review
Version 1 amended:	Version 2: Major changes: The whole of LSAS V1 is aligned in sequence to LSAS NHSC Framework against 15 domains. Page 7- bullet 2 is added, minimum age and wage is added from the UK law update Page 12 - Identified roles in organogram for LSAS Page 14 - point 5 is added (Operational Control) Page 14 - Operational control revised Page 18 - Last paragraph added to the "Recent review of the Policy" (point 3 "Responsibility towards community")	25 July, 2018
Version 2 amended:	Version 3: Page 5 – New position added to the company's flowchart (position: Operation Manager with appropriate responsibilities described) Page 6 – Standard Review Plan-summary Page 7 – New updated Plan for 2018-2019 submitted Page 9 – GDPR Policy reference added Page 15, 20 – GDPR link added to the list of references	10 July, 2019
Version 3 Amended:	Version 4: Company address details have been updated	10 July, 2019

Signed by:



Mayur Patel
Managing Director

Page **20** of **20**

Approved: 22/11/2018
DOC: RHC1794

Version 4