

LABOUR STANDARDS ASSURANCE SYSTEM (LSAS) POLICY

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.

1. Purpose and rationale of the Policy

The purpose of this Policy is to provide clarity to our employees, customers suppliers, subcontractors, concerning commitment and approach to respecting human rights and labour standards throughout our direct operations and supply chain. Furthermore, to meet requirements of the UK National Health Service Supply Chain Labour Standards Assurance System requirements.

2. Policy Scope and Responsibilities

The scope of this policy relates to labour standards covered by the LSAS includes standards relating to employees within Richardson Healthcare Ltd and workers within our global supply chain.

Richardson Healthcare Ltd has designated the Office Manager to develop and implement this policy. They are supported by all sectors of management and approved by the Managing Director.

3. Our commitment to Labour Standards

This policy was developed in order to meet the guidelines and standards established by the United Kingdom Labour Law, WTO, ILO, NHS Supply Chain Code of Conduct. 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.

Richardson Healthcare Ltd believes that human rights, which includes freedom from modern slavery and human trafficking, are an absolute and universal requirement and as such are committed to upholding those rights as expressed in the *Modern Slavery Act 2015*, *International Bill of Human Rights* and the *International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work*.

4. Objectives

Ethical Procurement

Our ethical objective is to ensure that people in our supply-chain are treated with respect and have rights with regards to employment, in relation to:

❖ **The prohibition of all forms of child labour to include:**

- The use of children in dangerous work.
- The procurement of children for illicit activity (drug trafficking, prostitution, and pornography)
- The use of children in armed conflicts

❖ **Forced/bonded labour**

❖ **Non-discrimination**

❖ **Non-harassment**

❖ **Living wages**

❖ **Working hours in compliance with local/national laws and regulations to include but not limited to:**

- UK Employees working a maximum of 8 hours a day and 48 hours in a working week.
- UK Employees being entitled to a minimum of 24 hours rest per week.
- UK Employees being able to work a maximum of 12 hours overtime in a working week.

❖ **Working conditions**

❖ **Freedom of association/collective bargaining**

❖ **Human Rights**

❖ **Equal rights**

❖ **Reporting Grievances**

5. Expectations towards our Suppliers

Our goal that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions.

All suppliers of products within the scope of the LSAS are also expected to adhere to Richardson healthcare's ethical Product Compliance Standards for Suppliers and communicate the policy on to their own supply chain.

6. Compliance and verification procedures

The assurance and verification procedures Richardson Healthcare has in place to implement, and monitor the implementation of the policy include:

- ❖ Supplier Self-assessment surveys and document verification for compliance against the Labour Standards Management System.
- ❖ Internal audits.
- ❖ External audits performed by MD in the form of regular site visits bi-annually.

7. Communication Training and Resources on LSAS Policy

This policy will be made available to the public and stakeholders on our website and will be communicated to internal employees (to include temporary employees and sub-contractors) and senior management on Richardson Healthcare's intranet. It will be available to suppliers impacted by the scope of our Labour Standards Assurance System through communication via Purchasing and Supplier Management. All UK staff impacted by this policy will be trained on applicable Labour Standards (Ref: RHC 1821).

Additional Labour Standard Assurance System resources include but are not limited to:

- ❖ Induction Training
- ❖ E-Learning Modules
- ❖ Printed publications

Richardson Healthcare Ltd is committed to making necessary human, financial and other resources necessary to monitor, review and implement this policy.

8. Ethical Conduct and Reporting

Richardson Healthcare Ltd is committed to promoting ethical conduct and legal compliance with our own employees and operations as well as throughout our supply chain, including our to our suppliers and contractors worldwide. Richardson Healthcare Ltd aims to foster an environment of open communication where concerns can be expressed in confidence directly to:

Office Manager Janet Demetriou, j.demetriou@richardsonhealthcare.com

Managing Director Mayur Patel, mp@richardsonhealthcare.com

Telephone at +44 (0)800 170 1126

9. Continual Commitment to the policy review

Richardson healthcare Ltd is committed to continually improving its Labour Standards Assurance Management System in line with this policy, and to meeting relevant targets to drive improved performance. The policy will be reviewed on an annual basis to ensure its continuing focus, relevance, and alignment to the legal requirements in the jurisdictions where we operate.

Revision Table

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: Amended to reflect the company address, contact person change,	10 July, 2019

Version 4 Amended:	Version 5: The Policy has been re-written through to reflect the key points.	2019
Version 5 Amended:	Version 6: The Policy has been re-written through out to reflect the key points.	December 2020
Version 6 Amended:	Version 7: Section 5 suppliers required to communicate our policy to their own supply chain	2022
Version 7: Amended:	Version 8: <ul style="list-style-type: none"> - Section 4: Expanded objectives. - Section 7: Updated policy availability and additional training resources. 	Sep-2022

Signed by:



Mayur Patel
Managing Director