Flexible Medical Packaging Ltd - Labour Standards Policy

Flexible Medical Packaging Ltd is engaged in the business of blending, manufacturing and packaging of healthcare products for customers which are suppliers and distributors of such products. Flexible Medical Packaging is not of itself obliged to comply with the Labour Standards Assurance Scheme. However, as a key supplier to customers who are required to comply, this policy confirms our commitment to comply with the principles of the Labour Standards Assurance Scheme (“LSAS”) in the course of our commercial activities, as set out in the NHS Supply Chain Supplier Code and with reference to the Ethical Trading Initiative base code and the UN Global Compact. In turn, we require that this commitment be accepted by relevant key suppliers in our supply chain. Flexible Medical Packaging will comply with local laws in all countries from which raw materials are sourced.

Scope of the Policy
Flexible Medical Packaging Ltd has implemented this policy in respect of the products supplied by its customers to the NHS, under framework agreements or contracts which require said customers to be accredited to LSAS.

Policy Review and Continuous Improvement
Flexible Medical Packaging Ltd will review this policy periodically in line with the level of risk identified in the supply chain, LSAS policy, NHS requirements (as notified to us by relevant customers) in respect of eligibility to supply and legislation changes in order to ensure adequacy, suitability and continuing effectiveness. The organisation is committed to continuous improvement of the principles set out in this Labour Standards Policy.

Senior management have committed to ensuring that sufficient resources are available to ensure ongoing oversight of our labour standards principles, within FMP and its supply chain.

Labour Standards
Flexible Medical Packaging Ltd has identified the following reasons to establish a comprehensive system of Labour Standards to guide its business operations.

- To ensure decent working conditions and rights for those working within our supply chain
- To identify and mitigate risk of (labour standards) non-compliance in the supply chain
- To meet the needs of our customers
- To procure and operate responsibly and ethically
- To ensure continuity of supply
- To drive sustainable quality standards
- To build resilience in our supply chain

The following principles underpin our business and this policy:

Child Labour: Flexible Medical Packaging Ltd shall not employ young persons who are under the legal age for employment. If young workers are engaged for the purpose of work experience then appropriate checks will be carried out to ensure they are not exposed to any harmful conditions and working day is limited to 8 hours.
**Forced or Compulsory Labour:** Flexible Medical Packaging Ltd shall not engage in and shall adopt a zero tolerance approach to any supplier, representative or business partner found to be involved in slavery, servitude or the use of forced or compulsory labour, or human trafficking. Employment is freely chosen and employees may freely leave upon reasonable notice. Flexible Medical Packaging Ltd does not operate any unpaid internship schemes. Flexible Medical Packaging Ltd shall continue to put into place practices and policies which support the objectives of the Modern Slavery Act 2015 in spirit as well as letter.

**Recruitment Policy:** We operate a robust recruitment policy, including conducting “eligibility to work in the UK” checks for all potential staff to safeguard against human trafficking or individuals being forced to work against their will.

**Working Hours and Remunerations:** Flexible Medical Packaging Ltd complies with the respective national laws and regulations with regard to working hours, wages and benefits.

**Discrimination:** Flexible Medical Packaging Ltd prohibits any discrimination on the grounds of gender, marital status, sexual orientation, pregnancy, race, colour, ethnic origin, nationality, religion or belief, disability, age, political opinion, trade union membership or any other legally protected status or form of harassment on any grounds. Furthermore, we do not discriminate on the grounds of part-time status or ‘spent’ criminal convictions.

**Health & Safety:** Flexible Medical Packaging Ltd recognises the importance and our duty to protect the workforce to ensure a safe and healthy workplace environment and to take effective steps to prevent potential accidents and injury to employees’ health by minimising the risk to our employees. All employees will receive safety training during their employment. Employees are encouraged to report any potentially unsafe working practices or breaches of standard procedures. Employees will have access to clean toilet facilities and drinking water. A member of the Senior Management Team has been assigned the responsibility for health and safety policy duties.

**Freedom of Association:** Flexible Medical Packaging Ltd agrees to abide by UK laws pertaining to this matter.

**Improper Payments/Bribery:** Flexible Medical Packaging Ltd complies with international anti-bribery standards as stated in the United Nations’ Global Compact and local anti-corruption and bribery laws including The Bribery Act 2010.

**Communication**
Flexible Medical Packaging Ltd will communicate the above to its key suppliers relevant to the products within scope and requires their commitment in turn. Where suppliers are located in a country other than the UK, suppliers should comply with relevant local legislation. Suppliers are required to complete the Flexible Medical Packaging Labour Standards Self-Assessment Questionnaire and confirm they have read and understood the Policy, evidence of which will be retained. This policy is publicly available on the company website at www.flexible-medical.com and is available to all employees via the HR department.

Signed by:

[Signature]

Adrian Sutton
Manager Director

Date: 26/09/19