



## LABOUR STANDARDS POLICY

Xiros are manufacturers of a wide range of textile based implants; implants incorporating metal or polymers; and surgical instruments which are sold globally.

The senior management team at Xiros is fully informed of the need for a Labour Standards Policy and the obligation to its employees, customers, and stakeholders.

This document outlines our policy in relation to labour standards and has been approved by our HR Director.

We will review this policy periodically in line with legislation changes both domestically and internationally. We will review the policy routinely at the Annual Management Review meeting to enable continual improvement to our systems.

We have identified the following reasons to establish a comprehensive system of minimum Labour Standards to guide our business operations.

- **Ethical Responsibilities** – we accept our obligation to our employees, customers and suppliers to operate in an ethical manner.
- **Risk of Supply** – we have identified that labour standards abuse in supply chain can pose a risk of supply. Any supply chain partners who breach employment legislation face enforcement action which could damage business and prevent them from being able to supply goods and services.
- **Damage to the company's reputation due to adverse publicity** - discovery of labour standards abuse presents a reputation and structural risk. (1) Turnover- customers may choose to purchase supplies and services from other sources. (2) Staff retention and recruitment may be affected as people choose not to work for a company associated with any labour standards abuses; this could also lead to low morale in the workplace and difficulty in recruitment. (3) Loss of trust with customers and suppliers within the wider sector.
- **Quality of Goods and services** – we recognise that there is typically a link between poor labour standards and poor quality of goods and services.

To help identify a set of minimum labour standards, we have referred to the following resources:

- ETI Base Code
- NHS Supplier Code of Conduct

- Social Accountability International SA8000
- UN universal declaration of human rights

#### **Minimum Labour Standards in UK:**

- **Child Labour** – We do not engage in or support the use of child labour. If we engage any Work Experience students, we will ensure that a suitable risk assessment is carried out, and that any young person is not exposed to any dangerous conditions and will not work more than an eight-hour day.
- **Forced or Compulsory Labour** - We shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave upon reasonable notice as outlined in their contract of employment.
- **Health & Safety** – We shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to employees’ health by minimising the risk to employees. All employees will receive safety and job training during their employment. Employees will have access to clean toilet facilities and drinking water. The health and safety responsibilities of Xiros Ltd have been assigned to the Compliance Director.
- **Freedom of Association** – the freedom of association is respected, and we will comply with UK employment legislation in regard to this.
- **Discrimination** – We will not engage or support any form of discrimination in our employment of staff with regards to salary, training and promotion opportunities, decisions to terminate employment including redundancy decisions. Any decisions based on any protected characteristic could be classed as discrimination. These policies are clearly stated in our equal opportunities policy, which is provided in the Company Handbook and shown to all new employees as part of their induction.
- **Disciplinary Practices** – We will treat all employees with dignity and respect. We shall not tolerate the use of corporal punishment, mental or physical bullying or verbal abuse of personnel. No cruel or inhumane treatment is allowed.
- **Working Hours** – We shall comply with all relevant laws and labour standards on working hours and holiday entitlement. Our normal accepted working hours do not exceed 48 hours per week. Before employment we ensure that all employees have the legal right to be employed in the UK.
- **Remuneration**- We shall comply with national laws and regulations relating to wages and benefits. All work-associated activities are carried out on the basis of a recognised employment relationship established according to national law and practice. The living wage is paid as a minimum to all employees.

**We are also committed to:**

- Compliance with appropriate legal requirements. We keep abreast of any legal requirements by checking appropriate NGO (NATLEX through ILO) websites and through membership of the Chartered Institute of Personnel and Development.
- Ensuring that key contractors, sub-contractors and suppliers are aware of this policy.
- Making available time and resource for the implementation of this policy.

**Whistleblowing**

Anyone wishing to whistle blow or report any issues can do so in confidence by emailing [kate.dejuan@xiros.co.uk](mailto:kate.dejuan@xiros.co.uk)

**Targets**

We are committed to the following targets:

- Self-Assessments to be returned within 20 working days
- Achieve Labour Standards Assurance System (LSAS) level 2 by October 2020
- Achieve Labour Standards Assurance System (LSAS) level 3 by October 2021
- “Low” risk ratings achieved and reviewed for all suppliers / contractors by January 2025
- Conducting Labour Standards Assurance System management reviews within 365 (+/- 15) days of the previous review
- Closing out all Labour Standards Assurance Systems complaints and CAPA actions with 60 days

Kate de Juan  
HR Director  
24 April 2020