



Crest Medical Group is committed to fair and honest trading, through its sourcing of quality merchandise and developing partnerships with suppliers who share the common principles of fair and honest trading.

Crest Medical is committed to positive procurement processes to ensure that we do not unintentionally put pressure on suppliers, leading to poor recruitment practices, worker conditions and low pay for some workers. Where possible we avoid:

- Aggressive pricing that does not consider sustainable production costs.
- Late, high volume orders.
- Inaccurate forecasting.
- Late or extended payments.
- Withdrawing from contracts at short notice.
- Unfair penalties for not meeting orders despite last minute changes.
- Inaccurate technical specifications.

Crest Medical is committed to ensuring we as an organization maintain satisfactory working conditions, comply fully with all legal requirements and the labour, health and safety standards in the United Kingdom.

We are also committed to ensuring that the merchandise we source is obtained only from suppliers who strive to maintain satisfactory working conditions, comply fully with all legal requirements and the labour, health and safety standards of those countries in which processes take place.

We seek to uphold the following standards in dealings with suppliers:

- We will seek to ensure that local law and good practice is observed for all employment relationships.
- All terms and conditions of employment must be compatible with fair, honest trading practices and have due regard to the welfare of individuals.
- We support a fair and reasonable reward for workers.
- We are opposed to the exploitation of children.
- We oppose the exploitation of workers in general and we will not tolerate forced labour or labour practices which involve the harsh or inhumane treatment of workers.
- We uphold the right of workers in conformity with local law to be members of trade unions of their own choosing and to bargain collectively.
- Suppliers must ensure that all manufacturing processes are carried out under conditions which have proper and adequate regard for the health and safety of those involved.
- We are opposed to discrimination in all of its forms.
- We recognise our responsibility to the environment and will seek to ensure that our suppliers do not
- Compromise standards which could impact adversely upon the local or global environment, Suppliers must ensure they have a strategic sustainability plan in place which is adopted as





the way we do business around here and demonstrate that marketing messages are truthful about the contributions they are making to sustainable targets.

- We will take all reasonable, practical steps and reserve the right to assess our suppliers to ensure that the required standards are being met.
- We will only trade with those suppliers who are open to the process of assessment and who are working towards compliance with our Code, if they do not already do so. In the event of any supplier failing to do so, we maintain the right to end the business relationship and cancel outstanding orders.
- We do however recognise that in the event of non-compliance, withdrawal of our business may cause severe hardship to those employed and will therefore work with our suppliers to move towards compliance.

We commit to ensuring we have systems in place which foster an environment of continuous improvement and we will ensure there is an adequate resource in place for both ourselves and to support our suppliers in achieving this aim.

Guiding Principles

Our principles draw upon International Standards, including the Ethical Trading Initiative Base Code, the International Labour Organization (ILO) conventions and recommendations, which in turn are based on the United Nations (UN) Universal Declaration of Human Rights and Convention on Rights of the Child. Sustainability targets aligned by PAS 2060.

Crest Medical is committed to applying and implementing all elements of this Code and its Guiding Principles.

Crest Medical is committed to preventing modern slavery and human trafficking from operating within either its own business or its supply chains (refer to *PP12 Modern Slavery Statement*, found on the HR system).

Crest Medical will not tolerate any form of bribery by, or of, its employees, agents or consultants or any person or body acting on its behalf. Senior Management is committed to implementing effective measures to prevent, monitor and eliminate bribery and corruption either in its own business or its supply chain (refer to *PP29 Anti Bribery and Corruption Policy*).

There is an understanding that certain elements will not be tolerated under any circumstances. Those elements being those that protect workers' fundamental human rights such as the use of forced, bonded or involuntary prison labour, physical abuse or discipline and extreme forms of intimidation.

Within this understanding it is recognised that some of these elements are aspirational and remediation will not always be able to be achieved immediately. In these circumstances we will work with our suppliers and key stakeholders to create tangible sustainable change towards the standards described.





In the interest of transparency, we will report our progress externally.

1 Terms and conditions

- There must be no forced, bonded or involuntary labour.
- No worker shall be required to lodge a deposit or identity papers with their employer.
- Where identity cards, etc. are required for registration / age validation purposes, employers should retain a copy for their records and return the original to the worker.
- Any worker shall be free to leave their employer after reasonable notice and shall normally be entitled to a reasonable period of notice in the event of termination of their employment.
- Workers must not be subjected to bullying, physical or verbal abuse or the threat of such.
- Workers must not be subjected to harassment (sexual or other) nor must they be subjected to other forms of intimidation.
- Disciplinary processes must comply with local law as a minimum, must be clearly defined and must be communicated to all workers. All disciplinary action taken must be recorded.
- Grievance procedures must allow for all workers to raise concerns with their employer about their Employment conditions or about other employees, without fear of reprisal.
- These processes must be clearly defined and communicated to all workers.

Subject to local law:

- All workers must be entitled to freedom of association.
- All workers must be entitled to join a trade union of their own choosing.
- All workers shall be entitled to bargain collectively.
- Employers must demonstrate an open attitude towards trade unions and their organizational activities.
- Workers' representatives must be allowed access to the workplace to carry out their functions and must not be discriminated against.
- Where local law restricts workers' rights to join a trade union of their choosing and to bargain collectively, employers must facilitate other means of independent, free association and bargaining.
- To every extent possible, work performed must be on the basis of a recognised employment relationship established through national law and practice. Part time, temporary, fixed-term contracts or homeworking arrangements shall not be used to avoid compliance with the principles of this code or to avoid obligations to employees under local labour law and practice. This includes workers supplied through agencies.
- Prior to employment, workers must be provided with written and understandable information about their conditions of employment, including rates of pay.
- Workers shall not be placed under duress to sign their agreement to terms and conditions (or changes to terms and conditions).
- Working hours shall not exceed the lower of local legal requirements or local norms for the industry.





- Workers shall not on a regular basis be required to work in excess of 48 hours per week.
- All workers must be allowed at least one day off in seven.
- Worker participation in overtime shall be entirely voluntary, shall not exceed 12 hours per week and shall be paid at a more favorable rate than the rate paid for basic hours.
- There must be no discrimination during recruitment or employment on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, ethnic origin or political affiliation.

2 Wages and Benefits

- Wages and benefits for basic hours must (as a minimum) meet local legal minimum wage criteria or local norms for the industry, whichever is the higher.
- In any event wages and benefits for basic hours must always allow at least enough for the provision of basic needs and some discretionary income.
- All workers shall be provided with written, understandable information (pay-slip) relating to their wages for each pay period.
- Where accommodation is provided, this must be safe, hygienic and not compromise the dignity of workers.
- Where a charge or deduction is made for accommodation, transport, meals or other similar benefit which is provided, this deduction shall not be excessive. After all deductions, wages must be in accordance with local norms for the industry allowing at least for the provision of basic needs and some discretionary income.
- All deductions shall be clearly indicated on workers' pay-slips'.
- 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 express permission of the worker concerned.

3 Age

- A child is any person under age 15 (or under age 14 in developing countries) or
- Any higher minimum age under local law for leaving school or starting work.
- Children shall not be employed.
- If child labour is discovered, urgent action must be taken to enable the child to attend and remain in quality education until no longer a child.
- A young person is any worker who is no longer a child but who is under the age of 18.
- A young person shall not be employed at night or in hazardous circumstances.
- The education, health, physical, mental, spiritual, moral or social development of a young person must not be adversely impacted by the work he or she performs, the number of hours worked or the conditions in which he or she works.

4 Health and Safety





- Responsibility for the implementation of Health and Safety shall be assigned to a senior manager.
- Working conditions for all employees shall be safe and hygienic.
- Emergency procedures must be in place and their efficacy evaluated at an appropriate frequency.
- Risk assessment (and risk management) shall be used as part of a proactive approach to accident Prevention.
- A review of all risks shall be carried out on a regular (and appropriate) basis.
- Adequate steps shall be taken to minimize the causes of hazards in the working environment.
- Workers shall receive health and safety training. This training shall be recorded and refreshed at an appropriate frequency. Workers shall not be assigned to any task for which they have not received the appropriate training.
- Clean toilet facilities must be accessible to all workers.
- Potable drinking water must be accessible to all workers.
- Provision for the hygienic supply and consumption of food (or the hygienic storage and consumption of workers' own food) shall be made.
- All factory and accommodation areas must have sufficient fire doors, escape routes & extinguishers.
- All escape routes & exits shall be clearly marked, suitably illuminated, kept clear and remain unlocked at all times.

5 Environment and Sustainability

- Suppliers must comply with local environmental legislation as a minimum and document their own Environmental aims in a written policy statement and sustainability aims.
- Responsibility for the implementation of environmental policy shall be assigned to a senior manager.
- Suppliers must consider the principles of sustainable development, in particular the optimum use of raw materials, the efficient use of energy, the safeguarding of biodiversity and the minimisation of adverse impacts arising from the use or disposal of their products.

6 Monitoring and Verification

We will take all reasonable and practical steps, including on-site assessments, to ensure that the required standards are adopted by our suppliers and in turn by their suppliers.

Development of the Code

We recognise that this Code must be developed to reflect practical experience and changing circumstances. We will continue to develop and share best practice with stakeholders so that we can all make real progress together.





CREST
MEDICAL

Policy

QC 152

Code of Conduct for Ethical Trading

Version: 1.08

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Signed:

Alastair Maxwell
Managing Director – Crest Medical Ltd.
17th April 2024

We hereby acknowledge receipt of the aforementioned code of conduct.

Company Name:

Signature

Name (Print)

Position:

Date:

