

## **Healthium Medtech UK Limited's Ethical Sourcing Policy**

*Based on the Ethical Trading Initiative base code*

Healthium Medtech UK Limited have adapted the following policy based on the Ethical Trading Initiative Base code as part of its sourcing policy. We follow the guidelines setup below for all our resources within Healthium Medtech UK Limited.

Hence, we request all our suppliers, subcontractors, and manufacturing facilities to sign and agree to the below guidelines as a minimum conformance. We also encourage you to disseminate ethical codes attuned to the below mentioned, with your first and second tier suppliers as far as possible throughout the supply chain.

### **Employment is freely chosen**

- There are no forced, bonded or involuntary labour.
- Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after giving reasonable notice.

### **Freedom of association and the right to collective bargaining are respected**

- Workers without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

### **Working conditions are safe and hygienic**

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing practice in the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health, arising out of, associated with, or occurring in the course of work by minimising as far as is reasonably practicable, the causes of hazards inherent in the working environment.

- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Access to clean toilet facilities, to potable water, and sanitary facilities for food storage shall be provided where necessary.
- Accommodation where provided, shall be clean, safe, and meet the basic needs of the workers.
- The company observing the code shall assign responsibility for health and safety to a senior management representative.

### **Child labour shall not be used**

- There shall be no recruitment of child labour, the minimum working age in accordance with the local/national laws shall be observed.
- Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing as child labour to enable her or him to attend and remain under quality education until no longer a child
- Persons under 18 shall not be employed at night or in hazardous conditions.
- These policies and procedures follows minimum conformance to the provisions of the relevant ILO standards.

### **Living wages are paid**

- Wages and benefits are being paid for maintaining a standard living , at par with a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet the basic needs and to provide some discretionary income.
- All workers shall be provided with written and understandable information about their employment conditions with respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they get paid.
- 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 expressed permission of the worker concerned. All disciplinary measures must be recorded.

### **Working hours are not excessive**

- Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 6 consecutive days worked. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and overtime shall always be compensated at a minimum of standard pay rates.

### **No discrimination is practised**

- There are no discriminations in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

### **Regular employment is provided**

- To every extent possible work performed must be on the basis of recognised employment relationship established through prevailing national laws and practices. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

### **No harsh or inhumane treatment is allowed**

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidations shall be prohibited.
- The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable laws and, where the provisions of law and this Base Code address the same subject, provision which affords the greater protection will be applied

We, Healthium Medtech UK Limited, do hereby confirm that we do follow the minimum and exceed the above Ethical Trading Initiatives, base codes and which forms part of our Ethical Sourcing document.

Details of person responsible for policy: -

(Print name) Lee Wrigley

(Signature) *Lee Wrigley*

(Position) Director

(Date) 20/3/2026

<b>Title</b>	<b>Healthium Medtech UK Limited's Ethical Sourcing Policy</b>
<b>Purpose</b>	This policy provides focus on sourcing at the highest possible standards of responsible, sustainable and socially aware business practices. Healthium Medtech UK Limited's primary goal is to ensure that products/goods and services are produced and delivered ethically, responsibility shall extend beyond the act of sourcing goods and services. It also includes the processes of evaluating and engaging with a supply market in order to effectively manage relationships with suppliers.
<b>Version No</b>	3
<b>Issue Date</b>	14/3/24
<b>Approved by</b>	Lee Wrigley
<b>Date of Approval</b>	20/3/26
<b>Next Revision Date</b>	March 2027

Date	Revision Made
14/3/24	Addition of subcontractors into the list of those expected to adhere to our Ethical Sourcing Policy
6/3/25	Reviewed and approved without change
20/3/26	Reviewed and approved without change