



# Labour Standards Assurance Policy v3

### Document Control

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### Revision History

Version	Date	Prepared By	Reviewed By	Approved By	Description of Changes
1.0	[06/03/2024]	[Emma Earley]	[Emma Earley]	[Lee Wrigley]	Some corrections, improvements to wording, clearer explanations and easier to read and follow
2.0	[06/03/2025]	[Emma Earley]	[Emma Earley]	[Lee Wrigley]	Reviewed and approved without changed
3.0	[27/04/2026]	[Natalie Hartley]	[Natalie Hartley]	[Lee Wrigley]	Document control page added. Font/layout reformatted

### Document Review

<b>Review Frequency</b>	Annual
<b>Next Review Date</b>	[27/04/2027]
<b>Document Owner</b>	[Director/Lee Wrigley]

### Document Status

Status	Definition	<input type="checkbox"/>
Draft	Document under development, not yet approved for use	<input type="checkbox"/>
Approved	Document reviewed and authorised for use	<input checked="" type="checkbox"/>
Under Review	Document currently being revised	<input type="checkbox"/>
Obsolete	Document superseded or withdrawn from use	<input type="checkbox"/>

## Healthium Medtech UK Ltd's Labour Standards Assurance Policy

Established in 2022, Healthium Medtech UK Ltd is a UK-based medical devices company specialising in the marketing of products for the secondary healthcare sector. The company is supported by dedicated and experienced employees with a deep understanding of the medical devices market. As a result, we have developed a reputation for providing high-quality medical devices that are fully compliant with UK specifications.

**Our vision:** Access to precision medtech for every patient, globally.

**Our values:** Agile, Inquisitive and Collaborative.

Healthium Medtech UK Ltd understands the corporate responsibility we bear towards our partners, customers, employees, and the communities in which we operate and that may be impacted by our operations as a result.

Healthium Medtech UK Ltd is against all forms of human rights violations, and this statement sets out the actions the company will continue to take to improve on our understanding of all potential risks within the supply chain and put in place steps that are aimed at ensuring there is compliance with Labour standards throughout our supply chain.

### Purpose and rationale of this policy

This policy aims to provide clarity to our employees, customers, suppliers, investors and other stakeholders regarding Healthium Medtech UK Ltd's commitment and approach to human rights and labour standards throughout our direct operations and the parts of our supply chain covered by the requirements of the UK National Health Service Labour Standards Assurance System requirements.

### 1. Healthium Medtech UK Ltd's commitment to Labour Standards

Healthium Medtech UK Ltd is committed to following the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work; the Healthium Medtech UK Ltd Ethical Sourcing Policy seeks to align with internationally recognised labour standards in relation, but not limited, to:

- Child labour
- Forced/bonded labour
- Non-discrimination
- Non-harassment
- Living wages
- Working conditions
- Freedom of association/collective bargaining
- Promoting a healthy work/life balance

## **2. Policy scope, responsibilities and Board-level support**

The scope of this Policy relates to the management of our suppliers covered by the LSAS. Healthium Medtech UK Ltd requires all employees, and suppliers of products falling under the scope of the LSAS to adhere to this policy. The scope of labour standards covered by the LSAS includes standards relating to employees within Healthium Medtech UK Ltd, its subsidiaries and workers within our supply chains. The Marketing Manager, supported by the Director and Healthium team, is responsible for the implementation and the ongoing management of this policy. It is further supported through approval and signoff by the Director. This policy is designed to be used as a framework for the Labour Standards Management System.

## **3. Commitment to comply with law and global standards**

Healthium Medtech UK Ltd is committed to ensuring its operations are compliant with the laws concerning labour and human rights in the countries where we may operate. We are also committed to upholding the ILO core labour standards and will endeavour to uphold the principles of these standards through our actions. Where national law imposes more stringent requirements, we will ensure compliance with those requirements while respecting the content of this policy.

## **4. Expectations of our suppliers**

We recognise that our responsibility for human rights and labour conditions encompasses our supply chain, and it is our goal that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions. We encourage all suppliers of products covered by the LSAS to comply with the provisions concerning human rights covered by the standards referenced in this policy. All suppliers of products within the scope of the LSAS are also expected to adhere to Healthium Medtech UK Ltd's Ethical sourcing Policy which has been based on the Ethical Trading Initiative (ETI) base code. We will monitor our selected suppliers based on internal risk assessment, audit findings and mitigation activity plans. We reserve the right to terminate supplier relationships where mitigation efforts have not yielded expected improvement in supplier performance or required compliance.

## **5. Assurance and verification procedures for the LSAS**

The assurance and verification procedures Healthium Medtech UK Ltd has in place to implement, and monitor the ongoing management of the policy include:

- Supplier self-assessment surveys.
- Visits to key suppliers every two years, others will be rotated as appropriate.
- Document verification for compliance against the Labour Standards Management System

## **6. Communication and training on LSAS policy**

This policy will be made available to the public on our UK website and will be communicated to internal employees in our shared folder system. It will be available to suppliers impacted by the scope of our Labour Standards Assurance System through communication via email.

## 7. Commitments to addressing significant issues identified as part of the LSAS

Healthium Medtech UK Ltd will identify significant labour standards issues of concern affecting products falling under the scope of the LSAS through our Critical Control Points document. Any concerns will be addressed via provisions of training and supplier guidance on risk mitigation. Following the identification of a violation, Healthium Medtech UK Ltd will investigate and where necessary take action if suppliers or specific employees are responsible for human rights or labour standards abuses.

## 8. Commitments to making available necessary resources

Healthium Medtech UK Ltd commit to making available the necessary financial, human and other resources required to review, implement and maintain the ongoing monitoring and review of this policy and LSAS across the organisation and within the supply chain as far as is possible. This includes the appointment and development of a cross-functional working team to collaborate on the successful delivery of the LSAS.

## 9. Promoting Ethical Conduct

Healthium Medtech UK Ltd is committed to promoting ethical conduct and compliance with our employees, through our operations and throughout our supply chain. We aim to have an environment of open communication where concerns can be raised freely with our whistleblowing policy, directly to our Human Resources department.

## 10. Commitment to policy review process

Healthium Medtech UK Ltd is committed to continually improving all aspects of its organisational responsibilities which includes the wellbeing of employees, our corporate social responsibilities and the labour standards assurance management system in line with this policy to meet and exceed the relevant targets and ongoing changes to show improved performance and best practice approach.

This policy will be reviewed on an annual basis to ensure continuing focus, relevance, and alignment to the requirements of labour standards in the countries from which we source and manufacture our goods.

**Name:** Lee Wrigley

**Signature:** *Lee Wrigley*

**Title:** Director

**Date:** 27<sup>th</sup> April 2026