

Policy on Labour Standards

Introduction

New Co-ordinates Limited (t/a NEWCO Surgical) is committed to protecting the human rights of everyone who works for the Company and all those who have dealings with it. As a responsible company, we support the United Nations Universal Declaration of Human Rights that sets “common standards of achievement for all people and all nations”.

The Company’s policy on human rights and labour conditions has been developed with reference to the following documents:

- The ETI Base Code of the Ethical Trading Initiative
- The United Nations Universal Declaration of Human Rights.
- The ‘fundamental’ labour standards of the International Labour Organisation.
- The UN Convention on the Rights of the Child

The Company is committed to compliance with the NHS Supplier Code of Conduct. In pursuing compliance the Company intends that the working conditions throughout its supply chain will, as a minimum, comply with local laws in countries where its products are sourced.

The Company also recognises that in many countries legislation concerning human rights and working conditions falls below the international standard and abuses are often systemic in their host communities. The Company will commit the appropriate resources to working with organisations that can help to improve human rights and working conditions so that internationally-accepted labour standards are met throughout its supply chain.

Policy Guidelines

Child labour

The Company will not employ workers under the legal minimum age for admission to work stipulated by UK law and will operate in accordance with ILO conventions **138** on the minimum age for admission to employment and **182** on the banning of the worst forms of exploitation of child labour.

Forced labour

In accordance with ILO Conventions **29** on Forced Labour and **105** on the Abolition of Forced Labour, the Company will not make any use of forced labour, including prison or debt-bondage labour. We will not require the lodging of deposits or identity papers.

Freedom of association and the right to collective bargaining

The Company respects the principles of freedom of association and collective bargaining as defined in ILO convention **87** on the freedom of trade unions and the protection of trade union law and **98** on the right of organisation and collective bargaining.

Discrimination

In accordance with ILO Conventions **100** and **111** on Discrimination, the Company will not discriminate against any person based on race, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation or age. We will not tolerate sexual or racial harassment or bullying.

Health and Safety

The Company will provide a safe and healthy work environment and take all reasonable steps to prevent death or injury to anyone on our site. Information on health and safety issues will be provided to all our workers. All workers will have access to bathroom facilities and potable water

Discipline

The Company will not employ, or allow to be employed, any form of corporal punishment, physical coercion or verbal abuse. Any disciplinary matter will be dealt with through the Company’s published procedures.

Working hours

Working hours for the Company’s employees will be in accordance with UK law.

Bribery/Improper Payments

The Company will comply with international bribery standards, The Bribery Act 2010 and local anti-corruption laws and will not offer services, gifts or other benefits to influence Customers. Employees of the Company will not accept such benefits in return for favouring individual suppliers when placing Purchase Orders.

Environment

The Company will comply with all applicable environmental laws, regulations and standards and will implement an effective system to identify and eliminate potential hazards to the environment.

Business Continuity Plan

The Company will develop maintain appropriate measures to protect as far as possible against disruptions of its business.

Business Partner Dialogue

The Company will communicate the principles of the NHS Supplier Code of Conduct and its own labour standards policy to its sub-contractors.

Policy Review

The Company will review this Labour Standards Policy annually as part of its regular Management Review.

Non-Compliances

Details of non-compliance with this policy should be reported to the Managing Director.

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