



Instrument Management Services

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## **ETHICAL POLICY**

### **Introduction**

STERIS Instrument Management Services is committed to maintaining high ethical and environmental standards within the company and aims to influence its supply chain to adopt similar standards. We require all our suppliers to commit to ethical principles and to promote the same standards in their supply chains.

These Guidelines are based, generally, on the **NHS Supplier Code of Conduct and ETI Base Code**.

We recognise and honour our duty to protect the workforce used in the manufacture of our products and to work with our suppliers to influence the provision of fair wages and working hours, safe and hygienic working conditions, regular employment and no discrimination or harsh or inhumane treatment of employees.

### **Scope of These Guidelines:**

These guidelines apply to all areas of STERIS Instrument Management Services business and to its suppliers as well as to goods and services sourced by STERIS Instrument Management Services. STERIS Instrument Management Services requires all suppliers to observe the provisions of these guidelines and requires that such suppliers, in turn, obtain similar compliance with its provisions from their suppliers.

### **Ethical Policy:**

#### ***1. Employment is freely chosen***

(1.1) There is no forced, bonded or involuntary prison labour.

(1.2) Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after a reasonable notice.

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

(2.1) Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

(2.2) The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

(2.3) Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

(2.4) 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.

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

(3.1) A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of 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, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

(3.2) Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

(3.3) Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

(3.4) Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

(3.5) The company observing the code shall assign responsibility for health and safety to a senior management representative.

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

(4.1) There shall be no new recruitment of child labour.

(4.2) Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

(4.3) Children and young persons under 18 shall not be employed at night or in hazardous conditions.

(4.4) These policies and procedures shall conform to the provisions of the relevant ILO standards.

### ***5. Living wages are paid***

(5.1) Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

(5.2) All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

(5.3) 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 should be recorded.

## **6. Working hours are not excessive**

(6.1) Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

(6.2) Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.\*

(6.3) All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

(6.4) The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.

(6.5) Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

(6.6) Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

\* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

## **7. No discrimination is practised**

(7.1) There is no discrimination 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.

## **8. Regular employment is provided**

(8.1) To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

(8.2) 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.

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

(9.1) Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

(9.2) All disciplinary actions must be recorded and be fair, proportionate and fully compliant with local laws.

(9.3) Access to confidential means of reporting inhumane treatment and workplace grievances shall be provided.

In addition to the above base code the following will also form part of the policy:

## ***10. Environmental Standards***

(10.1) Suppliers must comply with applicable local environmental regulations and such additional environmental standards as STERIS Instrument Management Services may notify in writing from time to time.

(10.2) In any event Suppliers must demonstrate an awareness of environmental matters and a commitment to improving environmental standards (including, without limitation, waste reduction, increased recycling, reduction of pollution, increased use of environmentally friendly products from sustainable sources)

(10.3) STERIS Instrument Management Services has its own Environmental Policy which is found within the Staff handbook.

## ***11. Business Continuity Planning***

(11.1) The company has a disruption recovery plan to alleviate the impact of risks to fulfillment of customer requirements. The plan considers natural disasters, terrorism, system failures etc.

## ***12. Anti-Corruption***

(12.1) The company will observe current legislation and not operate corruptly or knowingly use corrupt sources. Corruption includes extortion and bribery.

## **Implementation of the Ethical Policy**

STERIS Instrument Management Services is committed to developing partnerships with suppliers who share the same common principles of fair and honest trading.

STERIS Instrument Management Services is committed to not only complying with this policy within its own business and ensuring that all relevant employees are aware of the policy, but to working collaboratively with its suppliers as well, therefore ensuring that the products it receives, are only obtained from suppliers who maintain satisfactory working conditions and, at a minimum, comply fully with all legal requirements and the labour, health and safety standards of those countries in which the processes of those products will take place. STERIS Instrument Management Services will support our suppliers and contractors

in achieving this objective and will abide by the following principles in order to achieve a continuous improvement in ethical performance.

STERIS Instrument Management Services also commit to:

- Allocate the required resources in order to fully implement the policy, including an internal system to record and monitor compliance throughout the supply chain to this policy.
- Assign responsibility for the implementation of this policy to an appropriately trained management representative who will provide the board, suppliers and other stakeholders with compliance updates and implementation performance as required.
- Acknowledge specific national, regional and cultural challenges that may affect compliance.
- Recognise suppliers own standards where they are comparable to our own.
- Communicate this policy to all suppliers and seek formal acceptance and commitment to the policy.
- Review the policy on an annual basis and wherever necessary and appropriate.
- Cease trading with suppliers demonstrating a persistent disregard for the policy while giving appropriate consideration to the impact this may have on the supplier and community in which they operate.

STERIS Instrument Management Services require their suppliers to:

- Comply with this policy and all applicable laws in their countries in which they operate. Where standards differ, the standard which offers the greatest protection to the workers shall apply.
- Allocate the relevant resources for implementation of an Ethical Policy.
- Communicate the policy to all employees, suppliers, sub-contractors, home workers and temporary and contract workers engaged in their supply chain. (STERIS Instrument Management Services will recognise the suppliers own policies and standards where they are comparable to our own.)
- Communicate openly and honestly with STERIS Instrument Management Services and allow access to documentation and sites as required to determine performance against this policy.

Signed:

  
Director

Date:

24 MAY 2018



***This section below is to be signed by the Supplier and a copy returned to STERIS Instrument Management Services:***

I confirm that \_\_\_\_\_ (\*insert your company name)

Understand, and is prepared to work towards full compliance with STERIS Instrument Management Services Ethical Policy with the support of STERIS Instrument Management Services.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Print Name)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Title)