



ETHICAL TRADING POLICY

(LSAS001)

Introduction

ProSys International Ltd, the London based medical device manufacturer, is committed to safeguarding the principle of applying ethical labour standards, both directly in our company and throughout our supply chain. To help achieve this we shall comply with both employment & human rights legislation and other relevant voluntary obligations; and encourage and where practicable require our key suppliers to ensure that their relevant national employment legislations are upheld. The scope of this policy primarily relates to our supply chain for the UK National Health Service (NHS) amongst others.

General Principles

ProSys International Ltd along with its employees will at all times demonstrate the highest levels of integrity, truthfulness, and honesty in order to uphold both personal and corporate reputations and to inspire confidence and trust in their respective actions. The company will conduct its business in a competent, fair, impartial, and efficient manner.

Labour Standards

This obligation aims to provide clarity to ProSys' employees, customers, suppliers, and other relevant agents on our commitments to international human rights and labour standards through our direct operations and supply chain. The company is committed to minimizing the marginalization and exploitation of its labour force, within the company and through its supply chain. The company through its supply chain will therefore adhere to local labour laws and regulations relevant to the areas in which ProSys or its suppliers operate, as well as established ethical labour standards. Our ethical labour standards are in alignment with the ETI Base Code and include:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed
- Irradiate discriminative practices

Further, ProSys is also committed to respecting internationally recognized human rights and labour standards as set out in the International Bill of Human Rights (Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights) and the ILO Declaration on Fundamental Principles and Rights at Work.

Where local or national laws conflict with international standards, ProSys will seek to respect the internationally recognized human rights and labour standards while still complying/adhering to local or national laws. ProSys expects its business partners and other parties, including but not limited to employees, suppliers, contractors, subcontractors, and recruiters to respect the human rights and labour standards set out in this policy.

ProSys will actively pursue those vendors who are capable of demonstrating that they adhere to local laws, regulations and the above listed standards, and, where applicable, will commit to work with vendors currently in the supply chain to ensure that their systems comply with this policy. Where noncompliance with this policy has been identified, we will take prompt action to work with the supplier to resolve the identified issue. We also reserves the right to terminate supplier relationships where mitigation and resolution efforts have not yielded improvement or policy compliance. The company is committed to continually improving its labour standards assurance system and this labour standards policy and will work to meet identified targets to drive improvements. We will commit to making sufficient resources available for the implementation, management, improvement and review of the Labour Standards Assurance System and this policy.

Environment

The company respects the environment and the need to protect it and minimise the impact its operations have on it. It is engaged in a continuous programme of improvement on environmental issues and complies with the principles contained within international standards (see Environmental Policy ref **LSAS005**).

Bribes and Corrupt Practice

The company does not allow the direct or indirect offer, payment, solicitation, or acceptance of bribes in any form. Our policy makes it clear that any employee found to be involved in any kind of corrupt practice is likely to be immediately dismissed and may well have committed a criminal act which could lead to prosecution (see Bribery & Corruption Policy ref **LSAS004**).

Health and Safety

The company is committed to providing a safe and healthy working environment for all of its employees both on and off site. To support this there is a programme of health and safety audits and safety training. The company applies its H&S standards to all visitors & consultants (see Health & Safety Policy ref **LSAS003**).

Customers

The company will take all reasonable care to avoid misleading statements, concealment, and overstatement in all of its advertising and public statements. It will seek to build long term partnerships with its customers by being honest and straightforward in its dealings at all times. It will strive to provide high quality medical devices on an ongoing basis as part of its continual improvement process (see Quality Policy ref **LSAS035**).

Employees

All employees are treated with dignity and respect with equal employment opportunities given to all irrespective of their race, religion, gender, sexual orientation, maternity, marital status, family status, disability, age, or national origin. Employees are offered a safe and healthy workplace and the company will not tolerate any form of harassment (see Equality & Inclusion Policy ref **LSAS002**).

Suppliers

Suppliers will be chosen on the basis of factors such as price, quality, delivery, service, and integrity. The company's choice of suppliers will be made objectively. Honesty and openness will be paramount in the company's dealings with its suppliers (see Procurement & Supply Chain Management Policy ref **LSAS006**).

Integrity of Data furnished

Every employee of company shall be entirely responsible in ensuring that the confidentiality of all data is retained and in no circumstance transferred to any outside party in the course of normal operations (see Confidentiality Policy ref **LSAS018**).

Reporting concerns

Every employee of ProSys shall promptly report to the management, any actual or possible violation of the Suppliers Code of Conduct or other event of misconduct, not in the company's interest (see Whistle Blowers Policy ref **LSAS012**).

This policy will be reviewed on a regular basis to ensure continued relevancy to business objectives, consistency with the labour standards system, and alignment with legal and other requirements, and will be reported to top management.

Signed



Dasa Dowling
Business Manager
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