



Going further  
for health

# Labour Standards Assurance System Policy

Version 6  
August 2021

## Policy Statement

PAUL HARTMANN's primary business is to sell and distribute medical products to the NHS.

This policy aims to provide clarity to our employees, customers, suppliers and other stakeholders concerning HARTMANN's commitment and approach to respecting human rights and labour standards throughout our direct operations, where we respect and promote labour standards through our own employment policies and practices, and the parts of our supply chain covered by the requirements of the UK National Health Service Supply Chain Labour Standards Assurance System.

This policy is intended as a guide only and should not be treated as a complete and authoritative statement of the law.

This policy is non-contractual and therefore does not form part of your Contract of Employment. PAUL HARTMANN Ltd reserves the right to amend this policy from time to time as it considers necessary. This policy should not be read in isolation but cross referenced with all relevant company employment policies and should be read in conjunction with The HARTMANN Code of Conduct.

## Commitment to Labour Standards

PAUL HARTMANN Ltd is committed to respecting all internationally proclaimed human rights. The LSAS policy aims to align with internationally recognised labour standards in relation to:

- Child Labour
  - The Company does not engage in or support the use of child labour. If the Company engages any young workers e.g. on work experience, it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions.
- Forced / Bonded Labour
  - The Company shall not engage in or support the use of forced or bonded labour, or compulsory or involuntary prison labour. Employees are free to leave upon reasonable notice.
- Non-Discrimination
  - The Company shall not engage in or support any discriminatory practices in hiring, remuneration, access to training, promotion, termination or retirement based on race, national or social origin, caste, religion, gender, sexual orientation, political affiliation, age or other conditions that could give rise to discrimination. The Company has an Equality and Diversity Policy which is readily available to all employees in the Staff Handbook.

Document Reference	Version	Valid from	Reason for change
ID_11	6	03.08.21	Review & Update

- Non-Harassment
  - The Company shall treat all employees with dignity and respect. The Company will not tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is allowed.
- Freedom of Association
  - The freedom of association is respected and the Company will comply with UK employment legislation in this regard.
- Working Hours
  - The Company shall comply with applicable laws and industry standards on working hours and holiday entitlement. The Company's normal working hours do not exceed 48 hours per week. The Company ensures all employees have the legal right to be employed in the UK.
- Health and Safety
  - The Company shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to employees' health by minimising, so far as is reasonably practicable, and in co-operation with its employees, the causes of hazards inherent in the workplace. All employees will receive job specific instructions during the course of their employment with the Company. Employees shall have access to clean, sanitary facilities and drinking water. The Company has a Health and Safety Policy which is readily available to all employees in the Staff Handbook.
- Remuneration
  - The Company shall comply with national laws and regulations with regard to wages and benefits.

## Objectives

- All HARTMANN employees receive annual training on the Code of Conduct
- To maintain LSAS Level 2
- To work towards LSAS Level 3
- To train all appropriate responsible personnel on LSAS
- To review this policy as part of the ISO9001 Management Review Meeting

## Reporting

- Should anyone wish to report any compliance concerns relating to this policy then please email Gareth Jones, UK Compliance and Data Protection Officer at [gareth.jones@hartmann.info](mailto:gareth.jones@hartmann.info) or email [compliance.uk@hartmann.info](mailto:compliance.uk@hartmann.info)

Document Reference	Version	Valid from	Reason for change
ID_11	6	03.08.21	Review & Update

## Resources

The Company is committed to making available necessary financial, human and other resources necessary to reviewing and monitoring the implementation of this policy. This includes the appointment of a LSAS representative and utilising the services of an external auditor to ensure compliance. Resources will also be made available to provide training to our employees.

## LSAS Team

Responsibility for the implementation, management and maintenance of the LSAS lies with the Operations Manager (Quality) and Head of HR UKI, however all members of the Senior Management Team (as defined on page 9 of the Staff Handbook) will take responsibility to ensure compliance.

In addition, the Supply Chain Project Officer (Quality Vigilance Contact) and HR Officer will support the implementation, management and maintenance of the LSAS. It is the responsibility of all employees to ensure that the requirements of the LSAS are met and adhered to.

## Suppliers

PAUL HARTMANN Ltd recognises that our responsibility for human rights and labour conditions encompasses our supply chain and it is our aim that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions. We encourage all suppliers of products and services covered by the LSAS to comply with the provisions concerning human rights covered by the standards referenced in this policy.

## Assurance and Verification Procedures

The assurance and verification procedures the Company has in place to implement and monitor the implementation of the policy include:

- Supplier questionnaires and document verification for compliance with the LSAS
- Internal and external audits

## Communication and Training

The policy will be made available to the public on our website and will be communicated to employees on the Company intranet and in the Staff Handbook. Training will be provided at Induction.

Document Reference	Version	Valid from	Reason for change
ID_11	6	03.08.21	Review & Update

## Abuse of Policy

Any abuse of this policy will result in disciplinary action up to and including summary dismissal.

## Change Protocol

Document Reference	Version	Valid from	Reason for change
ID_11	1	02.11.2017	New
	2	02.11.2018	Review
	3	02.07.2019	Review
	4	29.05.2020	Review
	5	28.07.2020	Review & Update
	6	03.08.21	Review & Update

Document Reference	Version	Valid from	Reason for change
ID_11	6	03.08.21	Review & Update