

Labour Standards Policy

The Cutting Edge Surgical Instruments (CESI) Limited Labour Standards Policy applies to both the internal organization, and its supply chain and is approved by the CESI Directors.

CESI is committed to complying with UK labour laws.

CESI commits to implement and to continual improvement using the internationally recognised standards set out in the NHS Supplier Code of Conduct and the ETI Base code: -

1. Employment is freely chosen.
2. Freedom of association and right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child Labour shall not be used
5. Living wages are paid.
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

and in addition to the above base code:

10. Environmental Standards
11. Business Continuity Planning
12. Improper Payments/Bribery Prevention
13. Freedom of movement is not prevented
14. No worker-paid recruitment fees are allowed.
15. Responding to a report of suspected modern slavery

Further details on the above standards can be found below.

CESI commits to making adequate & sufficient resources available to the Labour Standards Assurance System (LSAS), including personnel, time and financial backing.

LSAS is appropriate to CESI Limited, within its scope of the Manufacture, control of manufacture, repair, maintenance and distribution of surgical instruments.

This policy and LSAS principles are communicated to all employees by way of induction and training updates and evidence is retained.

Suppliers and Ethical Code of Conduct

CESI is committed to communicating LSAS principles to their supply chain and support all suppliers to adopt similar standards, promote those standards in their own supply chain and to adhere to local and national laws. All suppliers are sent an initial copy of the policy and will be sent updates when they occur or where risk identifies a need.

The standards, as listed above, in more detail are as follows:

1. Employment is freely chosen.
There is no forced, bonded or involuntary prison labour. 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 right to collective bargaining are respected
All workers have the right to join or form trade unions or their own choosing and bargain collectively. The employer shall adopt an open attitude towards the activities of trade unions and their organisational activities. Workers representatives shall not be discriminated against and will have access to carry out their representative functions in the workplace. 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
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. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers. The company shall assign responsibility for health and safety to a senior management representative.
4. Child Labour shall not be used
There shall be no new recruitment of child labour. 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. Children and young persons under 18 shall not be employed at night or in hazardous conditions. These policies and procedures shall conform to the provisions of the relevant ILO standards.
5. Living wages are paid
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. 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. 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

Working hours must comply with national laws, collective agreements, and the provisions below, whichever affords the greater protection for workers. These provisions are based on international labour standards.

- Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*
- 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.
- The total hours worked in any seven-day period shall not exceed 60 hours, except where covered as below.
- 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.
- 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 practiced

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. All protected characteristics will be recognised.

8. Regular employment is provided

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

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. All disciplinary actions must be recorded and be fair, proportionate and fully compliant with local laws.

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

and in addition to the above base code:

10. Environmental Standards

Suppliers must comply with applicable local environmental regulations. 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). The CESI Staff Handbook details the CESI Environment Policy.

11. Business Continuity Planning

Suppliers will have a plan or series of policies in place to ensure business continuity and minimise risks to fulfilment of customer requirements and continuity of workers' employment. This plan will include all relevant risks such as fire, natural disaster, terrorism, computer system failures etc.

12. Improper Payments/Bribery Prevention

Current legislation will be observed and not operate corruptly or knowingly use corrupt sources. Corruption includes extortion and bribery.

13. Freedom of movement is not prevented

Freedom of movement is a human rights concept encompassing the right of individuals to travel from place to place within the territory of a country, and to leave the country and return to it. The right includes not only visiting places, but changing the place where the individual resides or works.

14. No worker-paid recruitment fees are allowed.

The use of worker-paid recruitment fees must be prohibited, this includes Fees for so-called optional services, which are in fact integral to the recruitment process or where workers are misled or coerced into taking out such services (e.g. health insurance and translation services). The charging of these fees underpins modern slavery and debt bondage.

15. Responding to a report of suspected modern slavery.

Suppliers should have processes in place to be able to respond to a report of suspected modern slavery in their supply chain to ensure prompt and victim centred response, so that victims are safeguarded and supported whilst receiving justice and compensation. This should include cooperating with authorities.

CESI will work collaboratively with their suppliers to meet the requirements above whilst recognising differences in national laws and the suppliers own standards where they are comparable to our own. Consistent failure to meet requirements could result in removal from the CESI Approved Supplier List.

This Labour Standards Policy will be reviewed annually to ensure on going relevance to CESI activities. The evidence of that review is contained in the minutes of the CESI management review meeting.

The directors endorse this policy which is also published on our website www.cuttingedgesurgical.co.uk along with the whistle blower email whistleblower@cuttingedgesurgical.co.uk

Signed:



Date: 31 Jan 2025

Managing Director – Matthew Robinson