

## **Ballyclare Group**

Incorporating Simon Jersey Ltd & Ballyclare Ltd

## **Labour Standards Assurance System Policy**

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## Labour Standards Assurance System (LSAS) POLICY

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### Policy Statement

Ballyclare Group - incorporating Ballyclare Group - incorporating Simon Jersey Ltd and Ballyclare Ltd is committed to meeting its legal and moral obligations under current and any future legislation in relation to, LSAS, and to following accepted good practice in order to identify and implement the measures needed to control risks associated with activities, including and associated with the labour standards assurance system.

Key legislation:

ETI Base Code (&overseas)

Labour Standards Assurance System

The Health and Safety at Work etc Act 1974;

The Environmental Protection Act 1990

Equality Act 2010 as amended 2012

### Definition

The Labour Standards Assurance System (LSAS) is designed to reduce the incidence of labour standards abuses in the medical supply industry.

Companies who supply to, or will supply to, National Health Service (NHS) Supply Chain must ensure the use of fair labour in their supply chain. The LSAS was developed by NHS Supply Chain, the Department of Health and other industry bodies to guide companies in this fair labour process.

### Organisational Responsibilities

#### Managing Director

Has overall responsibility as the Management Representative for this Labour Standards Assurance System (LSAS)

The Management Representative has full responsibility and authority for its establishment, implementation, maintenance, and ongoing continual improvement.

He is responsible for reporting the effectiveness of the LSAS throughout the company, as the MD of Ballyclare Group - incorporating Ballyclare Group - incorporating Simon Jersey Ltd and Ballyclare Ltd and Ballyclare Ltd

To achieve this, adequate resources shall be allocated to the LSAS. These shall include the Product Director with a team to help deliver the project to be assisted by the HR

Director and the Compliance Consultant, to assist in its establishment and to carry out the external assessment to verify it complies with the applicable LSAS level.

## Senior Management and Team

### Typical duties include:

- Creating and publishing the Ethical Labour Standards Policy and the Procurement & Supply Chain management policy
- Approving all other relevant and related LSAS policies and procedures
- Carrying out a periodic review of the LSAS management system, typically on an annual basis
- To encourage suppliers, contractors and other parties key to the business, to comply to the principles of the Ethical Trading Initiative and/or NHS Labour Standards Assurance System
- Completing risk assessments to determine the level of risks related to each supplier
- Ensuring that any corrective action requests raised against a particular supplier, are addressed in a timely manner
- Allowing the administrative staff sufficient time to progress LSAS issues if required
- Documenting and taking action relating to any concerns about labour abuses

Ensure that adequate resource is provided to carry out necessary action to meet the following duties in relation to lone working:

## Continual Improvement

The Company commits to periodically review this policy in-order to continually improve, taking into consideration changes in legislation, and any other requirements to which the Company subscribes, and in order to ensure the adequacy, suitability and continuing effectiveness of the policy.

Specifically, the policy will be routinely reviewed at the Company's Management Review Meetings and will be integrated into its QMS.

## The Minimum Labour Standards

The Company has identified the following compelling reasons to establish a comprehensive system of Minimum Labour Standards to guide it in its business operations.

1. **ETHICAL RESPONSIBILITIES** - the Company acknowledges its obligations towards its customers, employees and the communities in which it works arising from its business operations and wishes to work and trade in an ethical fashion.
2. **THREAT TO SECURITY OF SUPPLY** – the Company has identified that labour standards abuses in supply chains can pose a risk to the security of supply. Any supply chain partners perpetrating abuses face legal enforcement action which may damage business and interfere with their ability to continue to supply.
3. **ADVERSE PUBLICITY AND DAMAGE TO THE COMPANY’S REPUTATION** – adverse publicity from the discovery of labour standards abuses in the Company’s supply chain presents reputational and structural risks as follows – (a) income – customers may choose to purchase supplies and services from other providers (b) staff recruitment and retention – staff may choose not to work for a Company associated with any labour standards abuses and this may lead to poor morale in the work place and difficulty in recruitment (c) loss of trust – both with customers and suppliers and also within the wider community.
4. **REDUCED QUALITY OF GOODS AND SERVICES** – the Company recognises that there is commonly a link between poor labour standards and poor quality of goods and services. To this end, it is in the interest of the Company to ensure its suppliers reach minimum labour standards targets at all times.

To help it identify a defined set of minimum labour standards, the Company has particularly referred to the following resources:

Social Accountability International’s SA8000 document and the UN’s Universal Declaration of Human Rights

### These minimum labour standards are:-

1. Child Labour – the Company does not engage in or support the use of child labour. If the company engages any young workers (eg: 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, or in any case work more than 8 hours per day.
2. Forced & Compulsory Labour – the Company shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave upon reasonable notice.
3. Health & 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 minimizing, 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 safety and job specific instructions during the course of their employment with the company. Employees shall have access to clean sanitary facilities and drinking water. Responsibility for implementing the Health & Safety element of this policy is assigned to the TPB Partnership.

4. Freedom of Association – the freedom of association is respected and the Company will comply with UK labour relations legislation in this regard.
5. 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 affiliations, age or other conditions that could give rise to discrimination.  
The Company has an Equal Opportunities and Diversity Policy which is shown to all new employees at induction.
6. Disciplinary Practices – the Company shall treat all employees with dignity and respect.  
The Company shall not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is allowed.
7. Working Hours – the Company shall comply with applicable laws and industry standards. In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate, Simon Jersey will also ensure all employees have the legal right to be employed in the UK.
8. Remuneration - the Company shall comply with national laws and regulations with regard to wages and benefits. All work related activities are carried out on the basis of a recognised employment relationship established according to national law and practice.
9. Whistleblowing  
Ballyclare Group - incorporating Simon Jersey Ltd and Ballyclare Ltd is committed to the highest standards of openness, probity and accountability.

Although the Ballyclare Group acknowledge the importance of the whistleblowing procedure it must be stated that it is not the appropriate vehicle for resolving individual grievances, and employees are encouraged to use more appropriate internal procedures such as the grievance procedure or bullying and harassment procedure to resolve such matters. An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Ballyclare Group to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs.

Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers because of publicly disclosing certain serious concerns.

Ballyclare Group - has endorsed the provisions set out below to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns. It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Ballyclare Group nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside of Ballyclare Group.

For full details please see website..

The Company also commits to:-

- Compliance with relevant legal and other requirements to which it subscribes
- Ensure that all its key contractors, sub-contractors and suppliers are aware of this policy
- Make available sufficient resources for the implementation of this policy.

***The Company will make this policy publicly available (specifically via its website and the policy will also be made available to all employees of Ballyclare Group and also to all contractors, sub-contractors and suppliers).***

## Key Contacts

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