



Spectrum
Fernbank House
Springwood Way
Macclesfield
Cheshire SK10 2XA

Tel: 01625 618816
Fax: 01625 619959
www.spectrum-uk.co.uk

Labour Standards Assurance System Policy

Spectrum distributes a range of ophthalmic medical devices throughout the United Kingdom and Southern Ireland. The products we distribute include: Surgical lenses, single use instrumentation and procedural packs for use in hospital theatre and clinic environments. We also distribute a range of phacoemulsification and diagnostic equipment, alongside single use ophthalmic cannulas, knives and Irrigation/Aspiration hand pieces. Our diverse portfolio allows us the opportunity to be extremely competitive, whilst procuring high quality products from around the world.

The senior management team, including the group CEO and president, support our responsibility in regard to a *Labour Standards Assurance System (LSAS)*. This enables Spectrum the ability to fulfil our obligation to our employees, customers and suppliers. We are proud to operate this system, and as such, make this document available for public perusal via our website.

Scope of the policy

Spectrum employs this policy with the expectation of supplying goods to the NHS via the NHSSC, NHS CPP, Ireland and Scotland framework agreements:

NHS CPP Complete Ophthalmology Solutions Framework Agreement;

OJEU reference number: 2016/S 243-443025

Offer reference number: LPP/2016/006

Commence 1/04/2017 – 31/03/2020 option to extend until 31/03/2021

NHS CPP Supply of Clinical Consumables Framework Agreement;

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OJEU Ref: 2016/s 173-310689

Project Reference: 1914/2185/NHSCPP/CCFW

Framework contract period: 1st March 2017 – 28th February 2021

Ireland National Framework Agreement for the provision of Ophthalmic — Implants and Consumables;

RFT 110149 – HSE 4586

Framework Contract Period: 1st February 2017 to 31st January 2019 with the option to extend for up to two periods of 12 Months to the end of January 2021.

Scotland Framework Intraocular Lenses and Viscoelastic;

OJEU Contract Notice Reference Number 2017/S 171-350203

Framework Agreement Reference: NP504/17

Framework Contract Period: 21st March 2018 – 20th March 2022

Scale of the policy

We are committed to implementing this policy as defined in EU law by Article 153 Treaty on the Functioning of the EU (TFEU), in regard to our company. It is also our responsibility to work with our suppliers through awareness questionnaires which will aid their knowledge and awareness of their responsibilities in relation to labour standards.

Continual improvement

We carry out a review of the LSAS policy and associated documentation annually. This is in line with current LSAS policy and legislation, which ensures that any changes within EU or UK law are updated accordingly. This will ensure that the policy remains suitable, effective and current.

Measureable targets

All targets set are measurable and with the assistance of our suppliers, aim to comply with our set targets within the agreed timeframes, which are set out in our procedures.

International labour legislation amendments

To ensure ongoing compliance with international legislation, the designated person will access the *International Labour Organisation* website and NATLEX for any updates. If any updates in legislation have been made, we will contact the relevant companies within this geographical area, to ensure that the legislation changes have been implemented into their processes and procedures.



Minimum Labour Standards

In line with our LSAS policy, we are committed to the following guidelines:

1. **Ethical responsibilities** – We acknowledge our responsibility to our employees, customers and suppliers within our supply chain operation and will operate in an ethical manner in all areas.
2. **Threat to security of supply** – We are aware that labour standard abuses in the supply chain can pose a risk to the supply of goods. Our supply chain partners could damage our business reputation and we could face legal action if any party within the supply chain is found to be exploiting LSAS legislation.
3. **Damage to the company's reputation due to adverse publicity** – Discovery of labour standards abuse presents a structural and reputational risk to:
 - Turnover – Customers choose to purchase goods and services from our competitors.
 - Staff retention and recruitment – Our reputation may be affected as people choose not to work for a company associated with labour standard abuses. This could lead to low morale in the workplace and make recruitment difficult.
 - Loss of trust – Not only with our customers and suppliers but the community at large.
4. **Quality of goods and services** – We recognise the link between poor labour standards and poor quality of products and services. It is in our interest to ensure our suppliers reach the minimum labour standards at all times.

We use the following document sources in completing and updating this policy and other associated documentation:

- Social accountability international SA8000.
- UN's universal declaration of human rights.
- ETI base code *Respect for Workers Worldwide*.

Minimum labour standards in the UK

1. **Forced or compulsory labour** – We are committed to not engaging or the supporting of business partners who use forced, compulsory, bonded or involuntary prison labour. Employees should be able to leave their employment upon reasonable notice.
2. **Freedom of association** – Is respected and we will comply with UK labour relations legislation. We have no restrictions on any employee joining trade unions or collective bargaining being represented within the business.
3. **Health and safety** – We will provide a safe and healthy workplace environment and shall take effective steps to prevent accidents or ill health to an employee.

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This will be ascertained through risk assessments. All employees will receive training in their respective roles. They will also be made aware of their responsibilities to the company and members of the public who they may encounter. Employees will have access to clean toilet facilities and clean drinking water, along with acceptable breaks throughout the working day.

4. **Child labour** – We do not engage with or condone the use of child labour. If any young person is engaged on work experience for example, a suitable risk assessment will be carried out and ensure that they are not exposed to working longer than 8 hours, or that they exposed to dangerous working conditions.
5. **Remuneration** – We shall comply with national laws and regulation relating to wages and benefits. All work associated activities are carried out on the basis of a recognised employment contract, which has been established according to national law and practice. Deductions of wages are not permitted under the current terms and conditions for any disciplinary action.
6. **Working hours** – We will comply with relevant laws and labour standards on working hours and holiday entitlement. Our working hours do not exceed 48 hours per week and overtime hours do not exceed 12 hours per week. We will ensure that all employees have the legal right to be employed in the UK.
7. **Discrimination** – We will not engage or support any form of discrimination in relation to employees. This applies to salary, training, promotion, termination or retirement based on race, national or social origin, religion, gender, sexual preference, political or union affiliations, age or other circumstance that could be classed as discrimination.
8. **Regular employment** – In line with the contract between employer and employee, regular work will be provided as per national laws.
9. **Disciplinary practices** – We will treat all employees with dignity and respect. We will not tolerate the use of corporal punishment, mental, physical or verbal abuse and bullying. No cruel or inhumane treatment should be allowed or advocated from ourselves or our business partners.

We are also committed to:

- Ensuring that key contractors, sub-contractors, business partners and suppliers are aware of this policy.
- Make available time and resources for the implementation of this policy.

Whistleblowing:

In line with current regulations, below is a list of numbers that can be contacted to discuss any labour standard issue that may arise, where an employee may not be able to discuss within the company they are employed.



Whistleblowing Advice Line:

UK 020 7404 6609

Spectrum 01625 618816

We will make this policy public via our website <http://www.spectrum-uk.co.uk/> and it will be communicated to our employees and all contractors, sub-contractors, business partners and suppliers.



Ian Snelson

Managing Director

19 August 2019

