

# Supplier Code of Conduct

## Objectives of the Code

Vygon recognises the importance of corporate responsibility towards sustainable objectives and of maintaining high standards of social, ethical and environmental conduct. We acknowledge and endorse the UN Global Compact, a standard for responsible business covering human rights, labour rights, the environment and anti-corruption. As sole providers of a range of products to the UK healthcare market we are committed to ensuring that our supply chain partners and contractors adopt a similar approach. Our code of Conduct has been devised with the aim of ensuring we achieve, along with our supply chain partners, compliance with the codes of conduct within it, or are actively working towards their adoption.

## Application of the Code

- The provisions of this code constitute minimum and not maximum standards
- It will not be used to prevent us from exceeding these standards
- In applying this code we will comply with national and other applicable law
- Where the provisions of law and this code address the same subject, the provision which affords the greater protection will be applied
- Workers are defined as those employed on a temporary or permanent basis, as well as workers that are employed either directly or indirectly.

## Laws and Ethical Standards

- As a Group Vygon comply with and endorses the SNITM Professional Code of Ethics and Conduct, relating specifically to the 'Medical Technology' industry
- The Code is taken from the Ethical Trading Initiative (ETI) Base Code, which is in turn founded on the conventions of the International Labour Organisation (ILO)
- Vygon (UK) Ltd shall endeavour to comply with all laws applicable to its business, to the principles of the United Nations' Global Compact, UN Declaration of Human Rights as well as the 1998 International Labour Organisation's "Declaration on Fundamental Principles and Rights at Work" in accordance with national law and practice, especially:

## Implementation of Code Requirements

- Vygon (UK) Ltd will employ management systems for delivering compliance to this Code, and maintain records demonstrating compliance
- An individual in a senior management position has been appointed to ensure compliance with the code
- Vygon (UK) Ltd will ensure communication and compliance of this code across all workers, suppliers and any out-workers or sub-contractors engaged in their supply chain
- Means will be provided for workers to report or discuss non-compliances confidentially

- Vygon (UK) Ltd will comply with all applicable UK national laws and all relevant ILO conventions. Where these standards differ, the standard that provides workers with greater protection will prevail.

## Code of Conduct Principles

### Child Labour

- Vygon (UK) Ltd does not employ or condone any form of child labour recruitment, denial of education, exploitation and protection of health and safety. Such policies will be thoroughly documented and communicated.

### Forced Labour

- Vygon (UK) Ltd does not employ or condone any form of enforced, bonded or involuntary labour of any description. Workers will be given the right to leave after giving reasonable notice, and with due regard to relevant domestic legislation, nor will they be expected to lodge “deposits” or their identity papers.

### Discrimination

- Vygon (UK) Ltd does not employ or condone any form of discrimination in hiring, compensation, access to training, promotion, termination or retirement, unless provided for in domestic legislation, based on (but not limited to) categories listed within International Labour Organisation Convention C111 Discrimination (Employment and Occupation) Convention, 1958
- Workers are not be expected to perform duties incompatible with their physical or mental abilities

### Health and Safety

- Vygon (UK) Ltd will make every effort to provide a safe and hygienic working environment, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps will 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
  - Vygon (UK) Ltd will ensure procedures are in place to deal with serious injuries. Fully documented risk assessments of Vygon (UK) Ltd sites and accommodation provided, will be made and risks posed to workers’ health and safety will be regularly monitored.

- A senior management representative has been assigned by Vygon (UK) Ltd, to be responsible for health and safety issues
- Workers will be provided with access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. They will receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers, procedures have been established for this Individual workers must be able to demonstrate their understanding of the job and the ability to perform it to at least the minimum standard required by their employer. Vygon (UK) Ltd will consult with workers to seek their contribution in assessing the site’s health and safety and in developing health and safety standards. Records of health and safety training are available for inspection.

### Freedom of Association

- Vygon (UK) Ltd recognises that workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. Vygon (UK) Ltd adopts an open attitude towards the activities of trade unions and their organisational activities. Workers, representatives are not discriminated against and 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.

### Discipline

- Vygon (UK) Ltd does not employ or condone any form of physical abuse or discipline, the threat of physical abuse, verbal abuse, harassment or other forms of intimidation are not acceptable. Disciplinary and grievance procedures will be clearly documented and communicated to all workers. All disciplinary measures of a serious nature shall be recorded, including evidence that the worker knew what they were accused of and were given the right to put across their point of view.

### Working Hours

- Working hours at Vygon (UK) Ltd comply with national laws and benchmark industry standards, whichever affords greater protection.

## Compensation

- Wages and benefits at Vygon (UK) Ltd will be at least fully comparable with locally benchmarked industry norms or national legal requirements, whichever affords greater protection. They will always be sufficient for basic needs whilst still providing some discretionary income. Vygon (UK) Ltd complies with the National Minimum Wage rates. Before entering into employment, workers are informed as to the payment process. Wages shall be paid directly to the workers in the form of cash or cheques or into the workers' nominated bank account, at the agreed intervals and in full. Information relating to wages is provided to workers in an understandable format. Deductions from wages as a disciplinary measure is not permitted, nor will the deduction from wages provided for by national law be permitted, without the expressed permission of the worker concerned.

## Regular Employment

- To every extent possible work performed will 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 will 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.

## Environmental

- Vygon (UK) Ltd constantly seeks to make continuous improvements in their environmental performance and, as a minimum, comply with the requirements of local, national and international laws and regulations. All practical efforts to minimise the use of energy, water and raw materials will be made and where possible, these resources shall be renewable. Practical efforts will be made to minimise solid waste and effluent and dispose of it in a safe, efficient, and environmentally responsible manner. Vygon (UK) Ltd will avoid contamination of the local environment and ensure that air, noise and odour levels are within nationally defined limits.

## Bribery and Corruption

- Vygon (UK) Ltd will comply with international anti-bribery standards and local anti-corruption and bribery laws designed to combat bribery and corruption. In particular, Vygon (UK) Ltd will not offer services, gifts or benefits to employees of other organisations, in order to influence the employee's conduct in representing any aspect in the product life of a Vygon product.

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