

OVERVIEW

Healthcare 21 (hereinafter referred to as the “Company”) recognises that its commercial activities have the potential to impact on its customers, suppliers and locality. Through an ethical trading philosophy, the Company is striving to ensure that what is bought, used and disposed of along with its business activities helps to build a fairer, more ethical, socially just and environmentally sustainable world.

The Company requires all suppliers to observe and comply with this policy. The Company directors have overall responsibility for all aspects of ethical trading at work within the business.

PURPOSE

The Company is committed to be a socially responsible business and its supplier’s, local community and customers can expect:

- all employees involved in the delivery of services by the Company are treated with full consideration to their basic human rights;
- the Company acts in an ethical manner above and beyond basic legal requirements.

DEFINITION

Item	Definition
Ethical manner	Acting in ways consistent with what society and individuals typically think are good values. Ethical manner involves demonstrating respect for key moral principles that include honesty, fairness, equality, dignity, diversity and individual rights.

SCOPE

This policy applies to all employees and any third-party representatives or sub-contractors.

POLICY

The Company will trade ethically by;

- not taking advantage of lower employment or manufacturing costs in developing countries;
- adhering to any Government recognised trading sanctions;
- not trading with those countries which the Company believes are violators of human rights;
- refusing to work with any client or prospective client which the Company has reason to consider exploits humans, animals or the environment unfairly.

The Company recognises that its ethical, social performance and reputation is a key part of overall commercial success.

EMPLOYEES

The Company is committed to ensuring that employment practices and the enforcement of corporate regulations ensure the protection of the rights of all employees. In many areas the Company aims to operate above the minimum standards required by law to ensure employees are safe, rewarded and valued.

CUSTOMERS

The Company is committed to demonstrating its ethical and social responsibility credentials to enable customers to make informed choices about services and products they purchase.

SUPPLIERS

The Company is committed to monitoring social standards in its supply chain and encourage suppliers to operate to the same ethical standards.

The Company source from many different suppliers and countries around the world – the majority would be highly developed. The Company require its suppliers to comply with all relevant legislation, through national law and practice.

GUIDELINES

The Company will ensure;

No forced, bonded or involuntary labour shall be used;

- all employment with the Company is freely chosen;
- employees are not required to lodge deposits or identity papers;
- employees are free to leave the Company after contractual notice.

No child labour shall be used;

- there shall be no recruitment of child labour;
- children or persons under 16 are not employed at any time, day or night;
- children or persons under 18 are not employed full-time;

Working conditions are safe and hygienic;

- the Company takes adequate measures to prevent accidents and minimise potential hazards;
- employees receive a health and safety induction along with regular health & safety training;
- employees have unrestricted access to toilet facilities and drinking water;
- the Company has a published Health & Safety statement.

Working hours and remuneration;

- are reasonable and comparable to other companies in our sector and regular employment is provided;
- employees pay rates are above the national legal minimum standards;
- employees are given written terms and conditions of employment that details the employment relationship and the respective obligations of the employee and the Company to include, full name of employer, registered address, place of work, job title, date of commencement of contract, remuneration, hours of work, grievance, bullying and harassment and disciplinary procedures, holiday entitlement, sick leave rules and notice periods for termination of employment;
- no deductions are made from wages as a disciplinary measure, and pay slips detailing lawful deductions are provided for each pay period;
- labour only contracting, sub-contracting and fixed term contracts are not used as a means to avoid obligations under labour or social security laws.

No discrimination is practised;

- there is no discrimination in pay, hiring, compensation, access to training, promotion, and termination of employment or retirement on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership or political affiliation;
- opportunities for personal and career development are equally available to all employees.

No harassment, threats, abuse or intimidation shall be practiced. Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited. Any breach of this policy may be seen as gross misconduct and may result in disciplinary action, up to and including dismissal.

DEALING WITH A CONCERN

Employees should, in the first instance, report any concerns with their manager, verbally or in writing. However, should an employee not wish to use this route, given the seriousness and sensitivity of the issues involved, they should raise their concern with a member of the senior management / HR team.

The Company will ask for the background and history of the concern, giving relevant details, such as dates, sequence of events (insofar as is possible) and a description of the circumstances.

However, should an employee not feel comfortable speaking to someone within the Company, a confidential external whistleblowing service is available, where the employee can call and log any concerns on any subjects such as unsafe practices, theft or illegal activity. The number is 0044 844 892 4413 and is available free of charge, 24 hours per day, 365 days a year.

CONFIDENTIAL