



CORPORATE RESPONSIBILITY



CONTENTS

Introduction

Definitions

RESPECTING OUR INDIVIDUALS

- **Employing Young Individuals and Child Labour (P.3)**
- **Health and Safety (P.3)**
- **Working Conditions (P.3)**
- **Equal Opportunities (P.4)**
- **Working Hours (P.4)**
- **Individual Human Rights (P.4)**
- **Remuneration (P.4)**
- **Collective Bargaining (P.5)**
- **Free Employment (P.5)**
- **Security of Employment (P.5)**

RESPECTING OUR SURROUNDINGS

- **External Environment (P.6)**

RESPECTING OUR INDUSTRY

- **Bribery and Corruption (P.7)**
- **Quality (P.7)**
- **Supply Chain Management (P.7)**
- **Data Protection (P.8)**
- **Breaches of this code of conduct (P.8)**
- **Review and Development (P.8)**

SUPPLIER DECLARATION OF ACCEPTANCE (P.8)

APPENDIX 1 – TARGET PROGRAMME (P.9)

INTRODUCTION

At Timesco, we pride ourselves on being a reputable company who manufacture medical devices for medical specialists, by employing staff and trading in an appropriate and ethical manner.

This document sets out our position on areas we feel are paramount to ensuring that the health and welfare of the people that work for or with us, is fully respected and that we work in a moral and ethical manner.

We have separated these standards into 3 main areas:

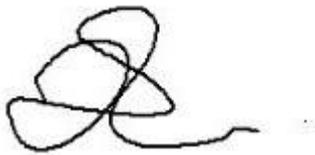
- Respect for our Individuals
- Respect for our Surroundings
- Respect for our Industry

In addition, this document sets out the standards we expect from the partners and/or companies who we work with, and finally those we work for.

We are committed to continual improvement within this area and will work to ensure that both our direct operations and those of our supply chain support these important issues.

We intend to have achieved full compliance with our Corporate Policy throughout our supply chain by 2020. Our complete objectives and target programme is available in Appendix 1.

Regards



ANGELA MASSEY
SALES AND MARKETING DIRECTOR

01ST AUGUST 2019

DEFINITIONS

Young Persons Those who have not attained school leaving age.

Full Compliance with our corporate policy

All of our suppliers whose wares directly relate to our sold product will be managed from an ethical trading perspective through this system.

NB: A person attains school leaving age on the last Friday in June of the school year that they will turn 16. It is possible to turn school leaving age whilst still 15 if they will turn 16 during the school holidays.

RESPECT OF INDIVIDUALS

EMPLOYING YOUNG PERSONS AND CHILD LABOUR

Young Persons will not be employed by the company.

In addition, the company will actively work to prevent the use of child labour within our supply chain.

HEALTH AND SAFETY

The importance of our employees' health, safety and wellbeing, is held with high regard. This is demonstrated by our undertaking to exceed our obligations as a dutiful employer and to provide a safe and healthy working environment.

To deliver excellence in this area, we consult regularly with our employees and deliver effective training for all levels of staff in this area.

In turn both employees and visitors are required to abide by the safety rules and to have responsibility for the safety of their colleagues and others who may be working with or visiting the company.

WORKING CONDITIONS

We are committed to ensuring that the working environment is, wherever reasonable, safe, suitable and a supportive place to work.

This includes, but is not limited to, ensuring that canteen and toilet facilities are maintained to a good standard are cleaned regularly and appropriately, appliances provided are safe and well maintained and facilities are provided for the safe storage of food if applicable.

Adequate steps will be taken to manage risk within our environment and all steps taken to ensure that accidents are kept to a minimum. On the rare occasions where accidents may occur, designated first aiders will be trained and have access to equipment to deal with minor injuries, and have the authority to escalate more serious accidents for hospital assessment.

All accidents will be recorded in accordance with legislation and reviewed periodically by a member of the Management team.

EQUAL OPPORTUNITIES

We are proud to have a diverse and multicultural workforce working together to achieve common goals. Discrimination on the grounds of race, colour, nationality, ethnic or national origin, age, sex, sexual orientation, marital status, disability, religion or belief will not be tolerated at Timesco.

In respect of the recruitment, training, development or promotion of employees and equal opportunities are available to all.

Developing our people is firmly embedded in our strategic approach. We recognise the value and importance of providing training and development opportunities to staff at all levels, to enable them to develop their job related knowledge and skills, as well as for their own personal development.

All employees have equal access to training and development opportunities applicable to the roles they perform.

WORKING HOURS

Working hours at Timesco comply with national laws and benchmarked industry standards.

No employees will be forced to work in excess of 48 hours per week. Any employee wishing to work more than 48 hours per week on a regular basis can opt out of this requirement. No employees will be forced to opt out of this regulation.

INDIVIDUAL HUMAN RIGHTS

We are committed to the principle that employees should be able to work in an environment free from intimidation or harassment. In addition, no harsh, cruel or degrading treatment or practices are allowed.

Any incidences of any of the above will be taken very seriously and in accordance with our disciplinary procedure.

REMUNERATION

Remuneration at Timesco will comply with national minimum wage laws and where applicable benchmarked industry standards.

Where employees are working in similar roles or roles of equal/equivalent value, irrespective of gender, those employees will be entitled to the same employment terms and conditions except where there is a material difference which justifies a differential.

Deductions from wages will not be permitted except as justified by law, the employment contract or the employee has expressed permission.

All employees will receive documentation stating the terms and conditions of employment within two months of starting with the company.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Employees are entitled to join related associations or trade unions of their choice. No employee will be advantaged or disadvantaged as a result of their choice to join, or not to join a trade union or other associated body.

Where trade unions or other associated bodies are active and recognised within the company, Timesco commits to work with the third party body to facilitate free association and bargaining.

FREE EMPLOYMENT

Individuals employed by Timesco are free to exercise their rights to terminate their employment with the company, when and if they decide under the terms of their employment contract.

No original official documents relating to the individual, i.e. passports, will be held for any employee during the course of the employment.

NB: Copies of documents may be required in order to comply with local legislation relating to competence or immigration status.

SECURITY OF EMPLOYMENT

All Employees who join are entitled to a contract of employment clearly stating the probation period, agreed start date, benefits, holiday entitlement, sick pay, pension scheme, notice period, grievance, dismissal, disciplinary procedures as well as collective bargaining.

RESPECT FOR OUR SURROUNDINGS

EXTERNAL ENVIRONMENT

We accept that our daily activities may have both a positive and negative impact on the environment. We are committed to managing our operations, products and services in such a way to preserve, protect and enhance the environment. Our goal is to minimise this effect and to reduce our carbon footprint on the environment wherever possible.

We aim to achieve this by:

- Ensuring that every aspect of our activities is conducted in accordance with environmental policies.
- Minimising the consumption of natural resources and energy, whilst consuming material goods in moderation.
- Reducing the creation of waste by improving practices and recycling materials whenever practical.
- Continually seeking to improve environmental practices and performance and develop more environmentally friendly products.
- Informing and educating all Timesco staff about environmental issues in the context of the business through appropriate training and information sharing.

RESPECT FOR OUR INDUSTRY

BRIBERY AND CORRUPTION

We guarantee to ensure that all dealings with Timesco are carried out professionally, fairly and with integrity across all our business dealings and relationships.

All employees are conversant with their individual and our collective responsibilities and are bound by the relevant legislation.

Timesco will not tolerate bribery or corruption in any form; or any associated behaviour that is considered to bring the company, its dealings, or its reputation into disrepute.

QUALITY

We strive to ensure that our company meets the following requirements as per the QP47 Procedure:

- ISO 13485 / CE Cert / EC Declaration of Conformity
- Medical Devices Directive
- Any internationally applicable standards or regulations

This is to ensure that our customers receive products of high quality that are fit for the purposes intended and safe for both the user and patient. We look to do this through our internal systems here and through evidence of similar systems and approaches throughout our supply chain.

We operate a system of “continuous improvement” to review where problems may have occurred and look at ways to resolve those problems and ensure that they do not happen again.

Our intention is that the Timesco brand should be, in itself, regarded by our customers as a guarantee of quality, reliability and safety.

SUPPLY CHAIN MANAGEMENT

Our aim is to source and produce quality products, working only with third parties who share our principles in relation to fair, honest and ethical trading.

All care is taken across the organisation to ensure that third party suppliers working with the company mirror our moral and ethical standards. In particular, that supplier sites maintain satisfactory working conditions and comply with all labour laws in the relevant country.

In the unlikely case of third parties being found to be acting in a way contrary to this code of practice, alliance with this partner will be appropriately evaluated in accordance with the Timesco Breach process. Dependant on the risk involved the supplier will be given the agreed time frame to act upon it.

DATA PROTECTION

In our day-to-day business, whether in respect of employees or third parties we always ensure that personal data remains confidential and that held data is done so in accordance with the Data Protection Act.

BREACHES OF THIS CODE

Any breaches of his code and our company morals will be taken very seriously and investigated at the highest level in accordance with our disciplinary procedure.

REVIEW AND DEVELOPMENT

We are committed to continual improvement within this area and will strive to ensure that both our direct operations and those of our supply chain support these important issues.

This document will be reviewed on an annual basis, in line with company objectives and legislation affecting this area.

SUPPLIER DECLARATION OF ACCEPTANCE

I/we [Insert name of company] have read, understood and commit to adhere to the standards within this document.

SIGNED :

PRINT NAME:

POSITION:

DATE:

APPENDIX 1

	OWNER	TARGETS AND OBJECTIVES	REVIEW DATE	KPI
STRATEGIC	ETHICAL TRADING FORUM			
		<ul style="list-style-type: none"> Maintain level 3 on the LSAS Matrix Work Towards level 4 on the LSAS Matrix by 2020 	November 2019 2020	
OPERATIONAL/ IMPLEMENTATION	PRODUCT MANAGER /PURCHASING MANAGER			
		<ul style="list-style-type: none"> Align Quality and Ethical Trading Systems Improve Supplier understanding and confidence in the LSAS programme via a comprehensive communications programme, including using the Partner for ongoing updates 	Dec 2018 Update Nov 2019, full implementation Nov 2020	Added to scope of the Internal Audit for assessment

	PURCHASING MANAGER			
		<ul style="list-style-type: none"> Align Company Objectives with Ethical Risk Rating (ET15) of Supplier Performance to be 90% 	DEC 2020	% achieved
		<ul style="list-style-type: none"> Review and Update ET15 Risk Rating and Implement 	DEC 2020	Record and chart
		<ul style="list-style-type: none"> Revised to align the Ethical checks with the quality factory audit 	Dec 2020	Grades obtained
		<ul style="list-style-type: none"> Achieve full compliance with Corporate Responsibility Policy throughout the whole supply chain 	Dec 2020	Grades obtained, recorded and reviewed annually.