

Supplier Code of Conduct

Objectives of the Code of Conduct

- Vygon (UK) recognises the importance of corporate responsibility towards sustainable objectives and of maintaining high standards of social, ethical and environmental conduct
- We are committed to ensuring our products offer maximum benefit to users and patients
- We are an official signatory of 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 throughout the supply chain adopt or are seen to be adopting a similar approach
- Our Code of Conduct has been devised with the aim of ensuring all supply chain partners adhere to the codes of conduct within it, or are actively working towards their adoption.

Application of the Code of Conduct

- The provisions of this Code of Conduct constitute minimum and not maximum standards. They should not be used to prevent companies from exceeding these standards
- Suppliers looking to apply the Code of Conduct are advised to refer to international guidelines and national or other applicable law
- Where the provisions of law and the Code of Conduct address the same subject, the provision which affords the greater protection should 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
- Suppliers are encouraged to have noted the requirements and to have established similar arrangements or provide evidence that they are working towards the requirements.

Laws and Ethical Standards

- 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)
- Suppliers are requested to comply with all laws applicable to its business. They are requested to adhere 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.

Implementation of Code of Conduct Requirements

- Suppliers are requested to establish management systems for delivering compliance to this Code of Conduct and maintain records demonstrating compliance
- An individual in a senior management position should be allocated the task of ensuring compliance with the code
- Suppliers should communicate compliance of this Code of Conduct to all workers, suppliers and any out-workers or sub-contractors engaged in their supply chain
- Vygon (UK) Whistle blowing policy (HR-139) is available on our main company website, www.vygon.co.uk, and can be used as guidance on reporting qualifying disclosures directly to us
- Suppliers should comply with all applicable national laws in the countries in which they operate and all relevant ILO conventions. Where these standards differ, the standard that provides workers with greater protection will prevail.

Reference: ILO Conventions 81 (Labour Inspection)

The Vygon (UK) Ltd Principles

Child Labour

- There shall be no recruitment of child labour
- Employment of child labour should be discontinued, unless the local minimum age for work or mandatory schooling specifies a higher age or if International Labour Organisation (ILO) developing country exemptions apply
- Suppliers employing child labour will be expected to cease the practice and provide remediation. This should include support for the child to attend and remain in education until the national minimum working age, or 15, or mandatory schooling age whichever is longest is reached
- Children must not be exploited or denied education, and their health and safety must be protected. Children may participate in activities which culturally involve the whole community over a limited period of time
- Children and young people under 18 shall not be expected to carry out work activities that are potentially hazardous or injurious to their health and development
- If under age workers are found working, the supplier involved will be expected to cease the practice and provide remediation
- Suppliers should document and communicate their policies for dealing with under age children, even if there are no known children currently employed.

Reference: ILO Convention 138, Minimum Age ILO Convention 182 Worst Forms of Child Labour

Enforced Labour

- There shall be no forced, bonded or involuntary labour of any description
- Suppliers shall allow their workers the right to leave after giving reasonable notice, and with due regard to relevant domestic legislation
- Workers should not be required to lodge “deposits” or their identity papers with their employer.

Reference: ILO Convention 29 Forced labour ILO Convention 105 Abolition of Forced Labour

Freedom of Association and Worker Representation

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively

- The employer 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.

Reference: ILO Convention 87 Freedom of Association and Protection of the Right to Organise ILO Convention 98 Right to Organise and Collective Bargaining

Discrimination

There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement, unless provided for in domestic legislation, based on (but not limited to):

- Gender
- Age
- Disability
- National origin
- Race
- Marital status
- Sexual orientation
- Political opinion
- Union (or non-union) membership
- Religion
- Caste
- Workers must not be expected to perform duties incompatible with their physical or mental abilities.

Reference: ILO Convention 100 Equal Remuneration ILO Convention 111 Discrimination (Employment and Occupation) ILO Convention 122 Employment Code

Environment

- Suppliers shall seek to make continuous improvements in their environmental performance and, as a minimum, comply with the requirements of local, national and international laws and regulations

- Suppliers shall make practical efforts to minimise the use of energy, water and raw materials: where possible these resources shall be renewable
- Suppliers shall make practical efforts to minimise solid waste and effluent and dispose of it in a safe, efficient, and environmentally responsible manner
- Suppliers shall avoid contamination of the local environment and ensure that air, noise and odour levels are within nationally defined limits.

Bribery and Corruption

- Bribery and Corruption is defined as “The receiving or offering/giving of any benefit (in cash or in kind) by or to any public servant or office holder or to a director or employee of a private company in order to induce that person to give improper assistance in breach of their duty to the government or company which has employed or appointed them”
- The supplier shall comply with international anti-bribery standards and local anti-corruption and bribery laws designed to combat bribery and corruption
- In particular, the supplier may not offer services, gifts or benefits to employees of other organisations, in order to influence the employee’s conduct.

Reference: OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions
 OECD Anti-Corruption Instruments
 OECD Guidelines for Multi National Enterprises United Nations’ Global Compact

Health, Safety and Hygiene

- Every effort shall be made to provide a safe and hygienic working environment, bearing in mind the prevailing knowledge of the industry and of any specific hazards
- Adequate steps should 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
- Procedures must be in place to deal with serious injuries
- Suppliers must complete fully documented risk assessments of their sites and accommodation provided, and regularly monitor risks posed to workers’ health and safety

- Suppliers are expected to assign a senior management representative to be responsible for health and safety issues
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided
- Suppliers should set up procedures to consult with workers to seek their contribution in assessing the site’s health and safety and in developing health and safety standards
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers
- Records of health and safety training must be available for inspection. 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.

Reference: ILO Convention 155 Occupational Safety and Health

Discipline

- Physical abuse or discipline, the threat of physical abuse, verbal abuse, harassment or other forms of intimidation are not acceptable
- Disciplinary and grievance procedures shall 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 should comply with national laws and benchmark industry standards, whichever affords greater protection.

Compensation

- Wages and benefits shall be at least fully comparable with locally benchmarked industry norms or national legal requirements, whichever affords greater protection
- Wages shall always be sufficient for basic needs whilst still providing some discretionary income. In the United Kingdom Vygon (UK) complies with the National Minimum Wage rates

- Before entering into employment, workers should be 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 shall be provided to workers in an understandable format
- Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned.

The National Minimum Wage rates (from 1 October 2009)
http://www.direct.gov.uk/en/Employment/Employees/TheNationalMinimumWage/DG_10027201

ILO Convention 100 Equal Remuneration

ILO Convention 131 Minimum Wage Fixing Convention

ILO Convention 95 Protection of Wages

Regular Employment

- To every extent possible work performed must 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 shall not be avoided through the use of labour-only contracting, subcontracting, 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.

Business Partner Dialogue

- The supplier shall communicate the above mentioned principles stated in the Code to its subcontractors and other business partners involved in the products and services described in the main contract and motivate them to adhere to the same standards.

Business Continuity Planning

- The supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, and medical/infectious diseases).

Our Supplier Engagement Process

- Vygon (UK) intend to engage our suppliers in our drive for sustainable procurement. In Vygon (UK) we will offer openness and transparency in our relationships with our suppliers and would request the same from them
- We will endeavour to support continuous improvement with any of our suppliers who need help in any area of our sustainable Code of Conduct
- Vygon (UK) reserves the right, upon reasonable notice, to check compliance with the requirements of this Code of Conduct
- Vygon (UK) will ensure continuous training of our procurement personnel to develop their expertise in this area
- The implementation of this Code of Conduct is overseen by the Vygon (UK) Management Review.



Dale Keegan
 Head of Finance, IT and Procurement