

# Labour Standards and Modern Slavery Policy

Mercian Surgical is a supplier of high-quality Surgical Instruments and Medical Devices to the NHS and private healthcare in the UK and export markets.

We are committed to upholding both UK law and legal compliance in the countries from which we source our products. We commit to upholding ethical labour standards in our activities towards both our customers, staff and our supply chain.

## **Scope of our LSAS Policy;**

Mercian LSAS policy is appropriate to the nature and scale of our company and is according to UK law. We commit to a continual improvement of our processes to ensure compliance to LSAS is maintained.

To ensure the effectiveness of our LSAS policy it will be annually reviewed as part of our QMS during management review meetings and form part of our QMS to ensure it remains effective, relevant and state of the art in respect of laws.

The LSAS policy will apply to ourselves, our supply chain and there the products we supply to the NHS as part of the Framework Agreement.

We require all our suppliers to comply with the ETI Base Code and anticipate their integration of these principles into their operations, striving for continuous improvement in accordance with ETI standards. Beyond the ETI code, we emphasize strict adherence to local laws and regulations in every jurisdiction where our suppliers operate.

## **Understanding & definition of our Minimum Labour standards;**

Mercian define their commitment to Labour Standards in the following areas;

- Child Labour
  - Mercian does not employ or support the use of child labour. If the company engages any young workers (on work experience), it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions, or in any case work more than 8 hours per day.
- Health & Safety
  - Mercian provides a safe and healthy workplace environment and shall take steps to prevent potential accidents and injury to employees by reducing, so far as is reasonably practicable, and in co-operation with its employees, the causes of hazards inherent in the workplace. All employees will receive safety and job specific instructions during the course of their employment with Mercian. Employees shall have access to clean sanitary facilities and drinking water. Responsibility for implementing the Health & Safety element of this policy is assigned to our Health & Safety Manager.
- Living Wages
  - Mercian complies with UK laws and regulations with regard to minimum wages and benefits.
- Working Hours
  - Mercian complies with applicable laws and industry standards on working hours and holiday entitlements. The Company's normal working hours do not exceed 48 hours per week.
- Working Conditions
  - Mercian will provide safe and comfortable environment for our workers.
- Freedom of association
  - The freedom of association is respected, and Mercian will comply with UK labour relations legislation.

- Non-discrimination
  - Mercian will not engage in or support any discriminatory practices in recruiting, remuneration, access to training, promotion, termination or retirement based on race, national or social origin, caste, religion, gender, sexual orientation, political affiliations, age or other conditions that could give rise to discrimination.
- Forced & Compulsory Labour
  - Mercian will not engage in or support the use of forced or compulsory labour, or bonded or involuntary labour. Employees are free to leave upon reasonable notice.

### **Compliance with the Modern Slavery Act 2015:**

Mercian Surgical complies with the Modern Slavery Act 2015 and is committed to preventing modern slavery and human trafficking in our operations and supply chain. We will publish an annual Modern Slavery Statement on our website and take defined steps to identify, assess, and mitigate risks. This includes supplier due diligence, appropriate staff training, and implementing corrective actions where concerns are identified.

### **Supplier Risk Assessment and Monitoring:**

Mercian will assess suppliers based on geography, industry, and spend to determine risk levels. We will conduct ongoing monitoring and audits where required to ensure compliance with labour and ethical standards. Where non-compliance is found, suppliers will be required to take corrective action, and contracts may be reviewed or terminated if issues persist.

### **Internal Awareness and Acknowledgement:**

All relevant Mercian employees must review the updated policy. Evidence will be recorded through email or signed acknowledgement. Training will be provided where needed to ensure staff understand their responsibilities regarding labour standards, ethical sourcing, and identifying modern slavery risks.

### **Senior Management endorsement:**

This policy as detailed in this document has the approval of the senior management at Mercian, the ultimate responsibility for implementation of the policy rests with the Managing Director, John Duffy.



John Duffy  
Managing Director  
Mercian Surgical Supply Company Limited  
3rd of December 2025