



## **C&G MEDICARE Ltd SUPPLIER CODE OF CONDUCT**

C&G Medicare Ltd is committed to providing the highest standards of product quality and business integrity in its dealings with Suppliers and ensuring that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally and socially responsible.

To ensure our relationships with Suppliers meet and support these expectations, C&G Medicare Ltd is endorsing the Medical Device Industry Supplier Code of Conduct as documented below.

C&G Medicare Ltd is also strongly encouraging our Suppliers to acknowledge and support our Code and seek to conform to its standards and provisions documented in detail below. In selecting qualified Suppliers C&G Medicare Ltd will be giving preference to those that are socially and environmentally progressive. In addition, failure to comply with the standards and provisions set forth in our Code may result in Supplier disqualification. Fundamental to adopting our Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules and regulations of the countries in which it operates. This Code encourages Suppliers to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility.

The Code is made up of five sections. Sections A, B, and C outline standards for Labour, Health and Safety, and the Environment, respectively. Section D outlines the elements of a minimally acceptable system to manage conformity to this Code. Section E adds standards relating to business ethics.

For the purposes of this document "Supplier" means any company, corporation or other entity that sells, or seeks to sell goods or services, to or on behalf of C&G Medicare Ltd. including the Supplier's employees, agents and other representatives.

### **A. LABOUR**

Suppliers should recognise and be committed to upholding the human rights of workers, and to treat them with dignity and respect as understood by the international community. Standards such as the Universal Declaration of Human Rights (UDHR), Social Accountability International (SAI) and the Ethical Trading Initiative (ETI) were used as references in preparing the Code and may be a useful source of additional information.



*The labour standards are:*

**a. Freely Chosen Employment**

Forced, bonded or indentured labor or involuntary prison labor is not to be used. All work will be voluntary, and workers should be free to leave upon reasonable notice. Workers shall not be required to hand over government-issued identification, passports or work permits as a condition of employment.

**b. Child Labour**

1. Child labour is not to be used in any stage of manufacturing. The term “child” refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported.

2. Workers under the age of 18 shall not perform hazardous work and may be restricted from night work with consideration given to educational needs.

**c. Discrimination**

There is to be no discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical/pregnancy tests that could be used in a discriminatory way. Workers with disabilities will be provided reasonable job accommodations as needed to perform their job function.

**d. Harsh or Inhumane Treatment**

There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers: nor is there to be the threat of any such treatment.

**e. Minimum Wages**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Any disciplinary wage deductions are to conform to local law. The basis on which workers are being paid is to be clearly conveyed to them in a timely manner.

**f. Working Hours**

Studies of good manufacturing practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Work weeks are not to exceed the maximum set by local law. Workers should be allowed at least one day off per seven-day week.



### **g. Freedom of Association**

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Suppliers are to respect the rights of workers to associate freely and to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment. Workers' rights to join labor unions, seek representation and or join worker's councils in accordance with local laws should be acknowledged.

## **B. HEALTH AND SAFETY**

Suppliers should recognize that the quality of products and services, consistency of production, and workers' morale are enhanced by a safe and healthy work environment.

Management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the Code and may be a useful source of additional information.

*The health and safety standards are:*

### **a. Machine Safeguarding**

Physical guards, interlocks and barriers are to be provided and properly maintained for machinery used by workers.

### **b. Industrial Hygiene**

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. When hazards cannot be adequately controlled by engineering and administrative means, workers are to be provided with appropriate personal protective equipment.

### **c. Safety**

Worker exposure to workplace safety hazards (e.g. electrical and other energy sources, fire, vehicles, slips, trips and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tag-out). Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate personal protective equipment.

### **d. Emergency Preparedness and Response**

Emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

### **e. Occupational Injury and Illness**

Procedures and systems are to be in place to manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and



illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and d) facilitate return of workers to work.

#### **f. Physically Demanding Work**

Worker exposure to physically demanding tasks, including manual material handling and heavy lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

#### **g. Dormitory and Canteen**

Workers are to be provided with clean toilet facilities, access to potable water and sanitary food preparation and storage facilities. Worker dormitories provided by the Supplier or a labor agent are to be clean, safe, and provide emergency egress, adequate heat and ventilation and reasonable personal space.

### **C. ENVIRONMENTAL**

Suppliers should recognize that environmental responsibility is integral to producing world-class products. In manufacturing operations, adverse effects on the environment and natural resources are to be minimized while safeguarding the health and safety of the public.

Management systems such as ISO13485:2003 ISO 14001, the Eco Management and Audit System (EMAS) and the Kyoto Environmental Standard (KES) were used as references in preparing the Code and may be a useful source of additional information.

*The environmental standards are:*

#### **a. Product Content Restrictions**

Suppliers are to adhere to applicable laws and regulations regarding prohibition or restriction of specific substances including labeling laws and regulations for recycling and disposal.

#### **b. Chemical and Hazardous Materials**

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

#### **c. Wastewater and Solid Waste**

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

#### **d. Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.



#### **e. Environmental Permits and Reporting**

All required environmental permits (e.g. discharge monitoring) and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

#### **f. Pollution Prevention and Resource Reduction**

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

### **D. MANAGEMENT SYSTEM**

Suppliers must adopt or establish a management system whose scope is related to the content of this Code and proportional to a Supplier's environmental and social accountability profile. The management system shall be designed to ensure (a) compliance with applicable laws and regulations; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement.

The management system should contain the following elements:

#### **1) Company Commitment**

Corporate social and environmental responsibility statements that affirm the Supplier's commitment to compliance and continual improvement.

#### **2) Management Accountability and Responsibility**

Clearly identified company representative[s] responsible for ensuring implementation and periodic review of the status of the management systems.

#### **3) Legal and Customer Requirements**

Identification, monitoring and understanding of applicable laws, regulations and customer requirements.

#### **4) Risk Assessment and Risk Management**

Process to identify the environmental, health and safety<sup>1</sup> and labor practice risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to ensure regulatory compliance to control the identified risks.

#### **5) Performance Objectives with Implementation Plan and Measures**

Written standards, performance objectives, targets and implementation plans including a periodic assessment of Supplier's performance against those objectives.

#### **6) Training**

Programs for training managers and workers to implement Supplier's policies, procedures and improvement objectives.



## **7) Communication**

Process for communicating clear and accurate information about Supplier's performance, practices and expectations to workers, suppliers and customers.

## **8) Employee Feedback and Participation**

Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.

## **9) Audits and Assessments**

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

## **10) Corrective Action Process**

Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

## **11) Documentation and Records**

Creation of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

## **E. ETHICS**

To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are to uphold the highest standards of ethics including:

### **a. No Corruption, Extortion, or Embezzlement**

1 Areas to be included in a risk assessment for health and safety are warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing /dormitories.

The highest standards of integrity are to be expected in all business interactions. Any and all forms of corruption, extortion and embezzlement are strictly prohibited resulting in immediate termination and legal actions.

### **b. Disclosure and Privacy of Information**

Means to effectively safeguard customer information regarding business activities, structure, financial situation, performance, and/or any other information deemed confidential shall be disclosed only in accordance with the guidelines specified within any agreed upon non-disclosure agreement between Supplier and C&G Medicare Ltd and within the guidelines of all applicable laws and regulations.



### **c. No Improper Advantage**

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted. No Supplier, or its representatives or employees, shall offer to any C&G Medicare Ltd employee a kickback, favor, gratuity, entertainment or anything of value to obtain favorable treatment from C&G Medicare Ltd. C&G Medicare Ltd. employees are similarly prohibited from soliciting such items. This prohibition extends to immediate family members of both Suppliers and C&G Medicare Ltd. As long as a gift is not intended to obtain favorable treatment for the Suppliers and does not create the appearance of a bribe, kickback, payoff or irregular type of payment, C&G Medicare Ltd employees are not prohibited from accepting the gift if: (1) it is £50 or less in value, (2) public disclosure would not embarrass C&G Medicare Ltd., (3) acceptance is consistent with C&G Medicare Ltd. business practices and (4) acceptance of the gift does not violate any applicable law.

### **d. Suppliers.**

Fair Business, Advertising and Competition Standards of fair business, advertising and competition are to be upheld.

Suppliers to C&G Medicare Ltd. shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of the antitrust laws.

### **e. Community Engagement**

Community engagement is encouraged to help foster social and economic development.

### **f. Protection of Intellectual Property**

Intellectual property rights are to be respected; transfer of technology and know how is to be done in a manner that protects intellectual property rights.

### **g. Accessibility**

Inherent accessibility features will be a) considered at the time of (re)design and (re)development, and b) implemented where financially and technically feasible.

### *References:*

The following standards were used in preparing this Code and may be a useful source of additional information. The following standards may or may not be endorsed by each Supplier.

ILO Code of Practice in Safety and Health

[www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf](http://www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf)

National Fire Protection Agency

<http://www.nfpa.org/catalog/home/AboutNFPA/index.asp>

ILO International Labor Standards

[www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm](http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm)

OECD Guidelines for Multinational Enterprises

[www.oecd.org](http://www.oecd.org)

United Nations Convention Against Corruption

[www.unodc.org/unodc/en/crime\\_convention\\_corruption.html](http://www.unodc.org/unodc/en/crime_convention_corruption.html)

United Nations Global Compact

[www.unglobalcompact.org](http://www.unglobalcompact.org)

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Universal Declaration of Human Rights

[www.un.org/Overview/rights.html](http://www.un.org/Overview/rights.html)

ISO 14001

[www.iso.org](http://www.iso.org)

SA 8000

[www.cepaa.org/](http://www.cepaa.org/)

SAI

<http://www.sa-intl.org>

Ethical Trading Initiative

<http://www.ethicaltrade.org/>

OHSAS 18001

[www.bsi-global.com/index.xalter](http://www.bsi-global.com/index.xalter)

Eco Management & Audit System

<http://www.quality.co.uk/emas.htm>

KES – Kyoto Environmental Standard

<http://web.kyoto-inet.jp/org/kesma21f/index.htm>