

Labour Standards Assurance System Policy

Sectra UKI



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1 Introduction

Sectra Limited provides an enterprise imaging portfolio to the NHS that provides a unified strategy for imaging and improves patient outcome while lowering operational costs.

Sectra solutions reduce the number of systems while providing top-of-the-line diagnostic capabilities spanning both image-intense departments such as radiology, breast imaging, pathology, orthopaedics, and cardiology as well as the needs of dermatology and ophthalmology among others.

In short, our offering allows customers to capture, store, access, share, and collaborate around medical multimedia throughout the entire enterprise and beyond.

This policy aims to provide clarity to our employees, customers, suppliers, investors and other stakeholders concerning Sectra's commitment and approach to respecting human rights and labour standards throughout our direct operations (where we respect and promote labour standards through our own employment policies and practices) and the parts of our supply chain covered by the requirements of the UK National Health Service Supply Chain Labour Standards Assurance System requirements.

1.1 Policy scope, responsibilities and Board-level support

The scope of this Policy relates to the management of Sectra suppliers covered by the LSAS. Sectra requires its UKI employees, and suppliers of products falling under the scope of the LSAS to adhere to this policy. The scope of labour standards covered by the LSAS includes standards relating to employees within Sectra and workers within our global supply chains. The LSAS Manager, supported by a cross functional working group, is responsible for the implementation of this policy. It is supported through approval and signoff by the UKI Country Managing Director.

This policy is designed to be used as a framework for the Labour Standards Management System in the UK and Ireland, and should also be used in conjunction with Sectra's Global Code of Conduct.

Sectra is seeking to implement a policy which is appropriate in nature and scale to the company and in line with its status, as defined by EU law, as an SME.

1.2 Commitment to Labour Standards

Sectra is committed to respecting all internationally proclaimed human rights, and operates in accordance with the International Bill of Human Rights (made up of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) as well as with the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. The Sectra LSAS Policy aims to align with internationally recognized labour standards in relation to:

- Child labour and forced labour
- Non-discrimination and preventing harassment
- Wages and hours
- Freedom of association

2 Health, safety and wellbeing Labour Standards

To help it identify a defined set of minimum labour standards, Sectra has particularly referred to the following resources:

- NHS Code of Practice
- Labour Standards Assurance Scheme
- International Labour Organisation (ILO)
- UN's Universal Declaration of Human Rights

2.1 Child labour and forced labour

We do not permit exploitation of children or involuntary servitude for our employees, or within our suppliers or business partners. This includes the consideration of debt bondage and unacceptable financial costs forced upon workers. We will not employ anyone under the age of 16. Employees under the age of 18 will not perform any hazardous work. We respect and comply with all relevant local laws regarding voluntary employment and minimum age for employment. We are committed to protecting the rights of all workers in our value chain, including migrant workers who may be only temporarily present.

2.2 Non-discrimination and preventing harassment

Every employee and person we work with is entitled to human rights without discrimination. In all aspects of employment, we treat employees justly according to their abilities to meet the requirements of the role. We will not discriminate based on factors such as race, religion, colour, ethnicity, national origin, disability, sexual orientation, gender, gender identity, gender expression or marital status. We provide a harassment free environment that promotes openness, teamwork and trust. We will not tolerate employees being subject to physical, sexual, racial, psychological, verbal, or any other form of harassment, bullying or abuse.

2.3 Wages and hours

We recognise the skills and contributions of all our employees and pay our employees competitive wages and benefits. We provide our employees with learning and development opportunities to enhance their skills and progress their careers. We comply with all wage and hour laws, collective agreements, and the provisions of the relevant ILO standards on working time. In the absence of applicable laws or collective agreements, normal working hours shall not on a regular basis exceed a maximum of 48 hours per working week, or 60 hours per working week including overtime, and employees shall be allowed at least one day of rest in every seven-day period. We require our suppliers and business partners to do the same.

2.4 Freedom of association

We respect our employees' choice to join or not join a trade union or other organisations of their choice and to bargain collectively in support of their mutual interests. In countries where the right to freedom of association is restricted by law, we support the development of alternative means to facilitate the representation of employees' interests. We take appropriate measures to prohibit any form of intimidation or retaliation against workers seeking to exercise their right.

2.5 Health, safety and wellbeing

We are committed to the highest standards of safety and security to protect ourselves, our suppliers, our business partners, and our communities. We will follow all safety policies and procedures, national and local laws and regulations. For more information regarding health and safety, please see the Health and Safety policy and manual.

3. Policy scope, responsibilities and Board-level support

The scope of this Policy relates to the management of Sectra suppliers covered by the LSAS. Sectra requires its UKI employees, and suppliers of products falling under the scope of the LSAS to adhere to this policy. The scope of labour standards covered by the LSAS includes standards relating to employees within Sectra and workers within our global supply chains. The Global LSAS Manager, supported by a cross functional working group, is responsible for implementation of this policy. It is supported through approval and signoff by the UKI Managing Director.

This policy is designed to be used as a framework for the Labour Standards Management System in the UK and Ireland, and should also be used in conjunction with Sectra's Global Code of Conduct.

4. Commitment to comply with law and global standards

Sectra is committed to ensuring its operations are compliant with the laws concerning labour and human rights in the countries where we operate. Sectra is also committed to upholding the ILO core labour standards; provided, they are not explicitly prohibited by applicable national law. Where national law restricts the implementation of internationally recognized standards, we will endeavour to uphold the principles of these standards through our actions. Where national law imposes more stringent requirements, we will ensure compliance with those requirements while respecting the content of this policy. Sectra has committed resources to ensure our policies and programs are consistent with labour and human rights laws. Sectra conducts a regular assessment of our supply chain concerning the risk of labour and human rights issues within our supply chain.

5. Expectations of our suppliers

Sectra recognizes that our responsibility for human rights and labour conditions encompasses our supply chain, and it is our goal that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions. We encourage all suppliers of products covered by the LSAS to comply with the provisions concerning human rights covered by the standards referenced in this policy. All suppliers of products and services within the scope of the LSAS are also expected to adhere to Sectra's LSAS Policy. We will evaluate our suppliers based on internal risk assessment when onboarding.

6. Assurance and verification procedures for the LSAS

The assurance and verification procedures Sectra has in place to implement, and monitor the implementation of the policy are external audit against the LSAS Framework.

7. Communication and training on LSAS Policy

This policy will be made available to the public on our UKI website and will be communicated to internal employees on our UKI Intranet. It will be available to suppliers as required, or on request.

8. Commitment to addressing significant issues identified as part of the LSAS

Sectra will identify significant labour standards issues of concern affecting products or services falling under the scope of the LSAS through the Labour Standards Status Review. Any concerns will be addressed via provision of training and supplier guidance on risk mitigation. Following the identification of a violation, we will investigate and when necessary take action if suppliers or specific employees are responsible for human rights or labour standards abuses.

9. Commitment to making necessary resources available

Sectra commit to making available necessary financial, human and other resources necessary to reviewing, and monitoring the implementation of this policy. This includes the appointment of an LSAS Manager and the development of a cross functional working group to collaborate on successful delivery of the LSAS. Senior management will formally review the labour standards programme during the routine Management Review meetings.

10. Promoting ethical conduct

Sectra is committed to promoting ethical conduct and legal compliance with our own employees and operations as well as throughout our supply chain, including to our suppliers and contractors worldwide. Sectra aims to foster an environment of open communication where concerns can be expressed freely.

11. Commitment to policy review process

Sectra is committed to continually improving its Labour Standards Assurance Management System in line with this policy, and to meeting relevant targets to drive improved performance. The policy will be reviewed on an annual basis to ensure its continuing focus, relevance, and alignment to the legal requirements in the jurisdictions where we operate.

Key things to remember:

- ✓ Treat everyone with dignity and respect
- ✓ Celebrate cultural and individual diversity
- ✓ Do not tolerate discriminatory, offensive or intimidating behaviour, harassment, or bullying; Commit to the highest standards of safety
- ✓ Do not knowingly work with anyone known or suspected to be acting in a way that infringes on anyone's human rights such as not complying with wage and hour laws, or permitting exploitation of children, or not respecting a choice to join or not join a trade union

Require partners, suppliers and other third parties with whom you work to adopt similar standards with respect to human rights and operate in line with the principles in our Partnering with Suppliers Standard

Where to get more information:

- Code of Business Conduct
- Employee Handbook
- Health & Safety Policy and Manual

How to report a breach:

You can report a compliance concern to the UKI HR Manager, the UKI LSAS Manager or Senior Executive Vice President Sectra ImIT AB.

Alternatively you can use the anonymous Whistleblowing link below:

<https://forms.microsoft.com/Pages/ResponsePage.aspx?id=znb3nh6FwUicsvXYSyLFYjVX1x9MjllgSKvQDk7KfxUODNZSjc1UEE5QUewSjU0VVdMMEhNVDJMUS4u>



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