

Rociale Ethical Procurement Policy

A. Introduction

We take social and environmental factors into consideration alongside financial factors in making decisions on the purchase of goods and the commissioning of services. Our purchasing decisions should, where practicable, consider whole life cost and the associated risks and implications for society. We will never make a purchasing decision based solely on cost.

Procurement can make a significant contribution to our goals of ethical procurement, by minimising any risk of social exploitation within the supply chain. We believe that this not only makes business sense, it also has the potential to improve the living and working standards of people around the world.

This policy sets out the detailed requirements and minimum expectations of our policy of ethical procurement. Specifically, it addresses the expectation that our staff and suppliers have a natural respect for our ethical standards in the context of their own particular culture and that relationships with our suppliers are based on the principle of fair and honest dealings at all times.

The same principle of fair and honest dealings must be extended to all others with whom our suppliers do business, including employees, sub-contractors and other third parties and their local communities.

B. Objectives

B1. Ethical Procurement

Our ethical objective is to ensure that people in the supply-chain are treated with respect and have rights with regard to employment, including the rights to freely choose employment, freedom of association, payment of a living wage, working hours that comply with national laws, equal opportunities, recognised employment relationship, freedom from intimidation and to a safe and healthy working environment.

B2. Sustainable Procurement

Our sustainability objective is to ensure a continuous improvement in procurement decisions measured against delivering ethical trading. More specifically, we seek to avoid adverse social and environmental impact in the supply-chain.

B3. Compliance

Our compliance objective is to adhere to the principles laid out in the International Standard Social Accountability 8000 (SA8000) and the NHS Supply Chain Code of Conduct for Suppliers and to seek third party certification to the LSAS standard, beginning with the Foundation Level in 2012.

C. Our Commitments

C1. Ethical Procurement

We expect our suppliers to comply with legal requirements and to adopt the following moral principles:

Regulatory compliance

- The supplier shall comply with all laws applicable to its business. The supplier should support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with national law and practice.

Employment

- There is no forced, bonded or involuntary prison labour.
- All employees, without distinction, have the right to join or form trade unions of their own choosing and, where a significant proportion of the workforce agree, to bargain collectively.
- Employees' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Elimination of child labour

- The supplier employs no children under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from the completion of compulsory schooling or training, or if the employment would be harmful to their health or development
- Suppliers should develop or participate in and contribute to policies and programmes that provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
- Children and young persons under 18 shall not be employed at night or in hazardous conditions.

Right to a living wage

- The supplier shall comply with the respective national laws and regulations regarding working hours, wages and benefits.
- In any event, wages should not be paid in kind and should be enough to meet basic needs.
- All workers should be provided with written and comprehensible information about their employment conditions in respect to wages before they enter employment and the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure should not be permitted. Deductions from wages not provided for by national law should only be permitted with the expressed permission (without duress) of the worker concerned. All disciplinary measures should be recorded.

Avoidance of excessive working hours

- Standard working hours must comply with national laws and national benchmark industry standards; whichever affords greater protection to the employee.
- All employees should not on a regular basis be required to work in excess of 48 hours per week and should be provided with at least one day off for every 7-day period on average. Overtime requested by the employer must be voluntary and must not be requested on a regular basis.

No discrimination

- A policy of equality for all should be in place and there should be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, religious beliefs, union membership or political affiliation.

Provision of 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 should not be avoided.
- Examples include the abuse of labour-only contracting, sub-contracting, or home-working arrangements, through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, or the excessive use of fixed-term contracts of employment.

No harsh or inhumane treatment

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse of other forms of intimidation shall be prohibited.

No bribery

- Bribes shall not be accepted or offered, under any circumstances, or for any reason.
- Rociale recognises that bribery is a criminal offence in the UK and shall comply with the Bribery Act 2010, no matter where in the world the act of bribery takes place.
- Any acts of bribery by those working for Rociale, or on our behalf, may result in a prosecution in the UK.

C2. Sustainable Procurement

Working in partnership

- We will seek out organisations that share our commitment to sound ethical performance and improvement. Where applicable, we will offer assistance to our suppliers in raising their awareness and social accountability. We will develop partnerships with our suppliers and contractors and work together to minimise the social impacts of our supply chain.
- Sustainability requirements will be considered and where appropriate will be specified in initial tender documentation for both suppliers and contractors, to ensure suppliers and contractors are aware of our social criteria at an early stage in the tender process.
- Small firms, voluntary and community organisations, social enterprises and ethnic minority businesses are considered members of our supply chain as they play an important role in the local economy and contribute to social cohesion.

Procurement process

- We will use our purchasing power, where practicable, to influence and encourage suppliers in order to create a more reliable market for ethically produced products and services.
- Social factors shall be considered in the purchasing process. Specifically this includes considering where the product is made and by whom and whether the organisation complies with local laws and regulations.
- We will add ethical compliance into the procurement cycle: identifying needs; appraising options; design and specification; supplier selection; tender evaluation; contract management and supplier development.
- Ethical concepts will be embedded into purchasing functions through training programmes.

Monitoring and measuring

- We will seek to establish key performance indicators for ethical procurement where appropriate and monitor and measure the performance of our supply chain against them.

C3. Safe and Healthy Working Conditions

We expect our suppliers:

- To provide a safe and healthy working environment bearing in mind international standards, the prevailing knowledge of the industry and of any specific hazards.
- To take adequate steps 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 practice and environment.
- Provide workers with suitable and sufficient health and safety training, in order that they fully understand the hazards associated with the work activity and environment and the correct practices required to minimise the risks.
- Provide suitable and adequate welfare facilities including toilet facilities, drinking water and food storage where required. Accommodation, where provided, shall be clean, safe and meet the needs of the workers.
- To assign responsibility for health and safety to a senior management representative.

C4. Environmental responsibility

We will consider our overall impact on the environment when making procurement decisions. We expect our suppliers to have a responsible attitude towards environmental issues and to strive towards improving their impact on global pollution.

D. Principles

We will use the following best practice principles to guide the implementation of our policy:

D1. Working together

We will:

- work collaboratively with suppliers in pursuit of this policy;
- guide relationships by the principle of continual improvement;
- welcome rather than penalise suppliers identifying activities that fall below this policy (undertaken by themselves or sub-contractors) and who agree to pursue their aspirations;
- consider a similar ethical trading standard as a reasonable alternative where suppliers are already working towards sustainability.

D2: Making a difference

We will, and we expect our suppliers to:

- use a social risk-based approach to the implementation of the principles of this policy;
- focus attention on those parts of the supply chain where the risk of not meeting these requirements is highest and where the maximum difference can be made with resources available.

Rocielle's suppliers should:

- be prepared to demonstrate the basis of their approach with regard to the above.

D3: Awareness raising and training

We will, and we expect our suppliers to:

- ensure that all relevant people are provided with appropriate training and guidelines to implement the requirements of this policy.

D4: Monitoring and independent verification

We will:

- recognise that implementation of this policy may be assessed through monitoring and independent verification, and that these methods will be developed as our understanding grows.

We will expect our suppliers to:

- provide reasonable access to all relevant information, premises, and workers (through interviews) and co-operate in any assessment against our policy – using reasonable endeavours to ensure that sub-contractors do the same.
- use reasonable endeavours to provide workers covered by this policy with a confidential means to report to the supplier failure to observe its requirements.

D5: Continuous improvement

We will, and we expect our suppliers to:

- apply a continual improvement approach in agreeing schedules for improvement plans with suppliers not meeting these requirements;
- base improvement plans on individual case circumstances;

Ultimately, Rocielle will not do business with a supplier where serious conflicts with our policy are identified and where the supplier consistently fails to take corrective action within an agreed timescale.

E. Responsibility and Authority

This policy is issued under the authority of the Managing Director of Rociale. Responsibility for implementation of this policy is set out below.

- Responsibility for the achievement of this policy and our objectives rests with the Management Team
- Managers are responsible for implementing the policy, monitoring its implementation in the everyday activities of their department and reporting back to the Management Team.
- The Managing Director is responsible for reviewing the policy and ensuring that it is kept up to date with changes in legislation. He is also responsible for the development of guidance and training on the implementation of the policy and for providing appropriate reports to the board.

F. Evidence of Compliance

1. Internal Monitoring

The Rociale Management Team will carry out regular monitoring of the implementation of ethical standards to enable us to identify trends and ensure that ethical and social factors are being considered in procurement decisions.

To demonstrate compliance with this policy standard, each department is required to provide access to documentation and records for audit purpose.

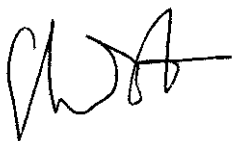
2. External Monitoring

Rociale will maintain third party certification against a nationally or internationally recognised standard, such as SA8000 or LSAS. Rociale will work towards certification to a recognised environmental standard such as ISO 14001 and ISO18001.

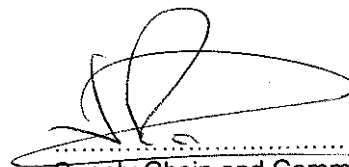
3. Targets

To demonstrate compliance with this policy standard and objectives, Rociale will introduce and maintain targets. Ethical targets are set to provide evidence of our commitment and effectiveness of our social responsibility.

- All Single Use Instrument suppliers by end of 2013, will have completed a desk top audit
- Identify Top 20 suppliers by Volume, by end 2013
- Identify Top 20 suppliers by Spend, by end of 2013
- Top 20 suppliers have ethical policies in place
- Map top 20 supplier, supplier chain by end of 2015
- Maintain SA8000
- Increase supplier awareness
- Extend supplier volume and spend to top 50 by end of 2014.
- Initiate Self audit questionnaire to top 50 by end of 2014
- Expand suppliers who have ethical policies in place



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Managing Director



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Supply Chain and Commercial Director