

Surgical Holdings is committed to upholding high ethical Labour Standards relating to the employment of personnel. These standards are not only maintained within the company, Surgical Holdings, but are sought from all suppliers within the company's supply chain. The ethical standards expected, not only apply to those who are directly employed within the supply chain but also to members of the public, stakeholders and interested parties who have an indirect involvement within the chain.

In order to develop, improve upon and maintain these Labour Standards within the company and its supply chain, Surgical Holdings has introduced procedures to:

1. Nominate a company Director as the person responsible for overseeing the effective operation of the company's Labour Standards.
2. Identify how Labour Standards relate to the company, map its supply chain and conduct risk assessments to identify possible Labour Standards' abuses and breaches of the ILO Core Conventions.
3. Identify Labour Standards' legal requirements relating to:
 - a. child labour
 - b. forced or compulsory labour
 - c. health & safety
 - d. freedom of association & right to collective bargaining
 - e. discrimination
 - f. disciplinary practices
 - g. working hours
 - h. remuneration
 - i. human rights

In each country from which product components may be sourced (utilising the NATLEX website: [NATLEX - Home \(ilo.org\)](http://ilo.org))

4. Set Labour Standards' targets and objectives at the time of Management Review and the monitoring of these targets and objectives (see below).
5. Make available the necessary resources to facility the Labour Standards' Policy. The role of company employees, relating to their responsibilities and authority, is documented in Job Descriptions.
6. Train employees such that they are competent in the relevant aspects of Labour Standards and ensure that personnel within the supply chain are likewise competent.
7. Define an effective and secure means of communication with all parties within the supply chain.
8. Adopt existing ISO 13485 procedures for document and data control.
9. Control Labour Standards Assurance processes such that they meet Policy requirements.
10. Manage Labour Standards requirements, risks and issues within the supply chain.
11. The emergency response to Labour Standards non-conformances. This will include emergency auditing of our supply chain by our appointed 3rd party LSAS auditing body in the event of a supply chain emergency.
12. Measure and monitor the Labour Standards Assurance System through internal audits and Management Review.
13. Conduct risk assessments leading to preventive action and ensuring the application of corrective action to non-conformances.
14. Encompass Labour Standards reviews within regular ISO 13485 Management Reviews.

15. Display our current policy on our web site to ensure stakeholder have access to this.
16. Carry out annual auditing of the supply chain where there may be potential Labour Standards risks.

LSAS Objectives for 2026:

- Conduct LSAS management reviews within 365 days (+ 5%) of the previous review.
- Conduct LSAS internal audits within 365 days (+ 5%) of the previous review.
- Close out all Surgical Holdings LSAS complaints / corrective / preventive actions within 5 days of the target completion date.
- Aim for 10% reduction in the Supplier LSAS non-conformance score (compared to the previous 12 months)
- Conduct LSAS training with the Surgical Holdings' Order Processing Team.
- Ensure Supplier self-assessment questionnaires are circulated, and responses assessed, every 3 years to Suppliers meeting the selection criteria.
- Maintain a Level 3 Labour Standards Assurance System (annually audited by SGS).

All employees of the Company shall take note of this Labour Standards Assurance Policy and Objectives and commit to the effective maintenance and continual improvement of the Company's Labour Standards Assurance System and all that it encompasses.

The Directors of the Company endorse the requirements as set out in this Policy.

Signed:

Date: 16th December 2025



D. Coole (Dec 16, 2025 14:04:12 GMT)

DANIEL COOLE

Managing Director / LSAS Manager

LSAS Policy & Objectives (issue 7, Dec 2025)

Final Audit Report

2025-12-16

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