Labour Standards Assurance Policy

Lenstec (Barbados) Inc.

Scope of the Policy

Lenstec Inc. was established in 1996, with the manufacturing plant being set up shortly after in Barbados to run alongside the Research & Development Head Office in St Petersburg Florida. Then in 1999, Lenstec set up a direct sales operation in the UK providing customers with a high-quality product, at competitive prices whilst offering an exceptional standard of customer service. Lenstec now supplies intraocular lenses and cataract & refractive products to over 80 Countries worldwide.
The vast range of products that Lenstec offers include monofocal and accommodative IOL's which, are both foldable and injectable through a micro-incision, as well as silicone, acrylic and traditional PMMA posterior and anterior chamber ranges.
Other consumables available from Lenstec include a range of Sodium Hyaluronate Solution and Hydroxypropyl Methylcellulose Viscoelastic Solutions, Capsular Tension Rings and an extensive range of Disposable Surgical Knives.

Purpose of the Policy

Lenstec understands and accepts its obligations and responsibility towards its customers, employees and the communities in which it works. We strive to provide high-quality products and services, whilst ensuring that any workers involved in the production or delivery of these are not exploited or treated in any way that breaks minimum Labour standards as stated in this policy. Suppliers and Contractors will be issued with our Policy and encouraged to commit to the standards herein. We have documented its policy in relation to Labour Standards, approved by senior management to support this objective.

The following compelling reasons have been identified to establish a system of Minimum Labour Standards to guide it in its business operations:

- Ethical Responsibilities
- Threat to Supply of Chain
- Threat to the Quality of Goods and Services
- Damage to Lenstec's Reputation and Adverse Publicity

Definition of the Policy

The company seeks to implement a policy which is appropriate in nature and scale and reflects guidance from the following acts below

Minimum Wage Act 1998 (revisions incorporated for 2012), Working Time regulations 1998,

Employment Rights Act 1996, Health and Safety at Work Act 1974, Pension Act 2004,

Also, to meet the guidelines and standards established by ILO, Employment Laws relevant to all Countries from which products are sourced, United Kingdom Labour Law and NHS Supply Chain Code of Conduct.

These Minimum Labour Standards are:

Child Labour
Lenstec does not engage in or support the use of child labour. If Lenstec engages any young workers (e.g. on work experience), it will ensure that a suitable risk assessment is carried out so young persons are not exposed to any hazardous conditions or excessive hours of work.

Forced & Compulsory Labour
Lenstec shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave upon reasonable notice.

Health & Safety
Lenstec shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to employees' health by minimizing, so far as 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 the company. Employees shall have access to clean sanitary facilities and drinking water. See Health and Safety Policy.

Freedom of Association
Workers, without distinction, have the right to join or form trade unions of their own choosing and bargain collectively.

Discrimination
Lenstec shall not engage in or support any discriminatory practices in recruitment, 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.

Disciplinary Practices
Lenstec shall treat all employees with dignity and respect. Lenstec shall not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is allowed.

Working Hours
Lenstec shall comply with applicable laws and industry standards on working hours and holiday entitlements.

Remuneration
Lenstec shall comply with national laws and regulations with regard to wages and benefits. All work-related activities are carried on the basis of a recognised employment relationship established according to national law and practice.

Supply Chain Management
Lenstec commits to incorporating into existing procedures, a Labour Market Status Review when contracting a new supplier. Our Labour Market Standards Policy will be issued. Where appropriate we will show a preference to suppliers with higher Labour Market Standards.
With existing suppliers, we will strive to ensure that Labour standards are continually improving, where needs are, with the distribution and communication of this Policy. We will regularly review and assess the status of our suppliers Labour Market Standards by reviews and regular visits.
Where a breach or need for improvement in Labour Market standards is found we will initially remind the supplier of our Policy and then set a date by which some improvement will need to be seen by us.
We will keep in contact with the supplier during this time. If no improvement is seen by this date, we will not place any orders from this supplier until remedial action has been taken and evidence has been presented to remedy the breach.

Review Procedure of the Policy

This Policy and all procedures relating to our Labour Market standards will be annually reviewed by the Sales Director who is responsible for its implementation, and the Commercial Services Manager, who is responsible for its delivery.

Lenstec is committed to keeping up to date with changes to relevant employment legislation and has procedures in place to ensure this.

Lenstec has also made arrangements for an external auditor to advise on the policy and identify areas for improvement.

Sufficient resources will be allocated to meet these requirements on an ongoing basis.

Please send all enquiries regarding this policy, labour standards or non-Compliance issues to:
Nikki Smallwood – Commercial Services Manager - 01924 382678 or nsmallwood@lenstec.com

Approved by:

Jim Woodward
Sales & Marketing Director
October 2015

Written & Managed by:

Nikki Smallwood
Commercial Services Manager
October 2015

Internal Use Only:

Date of Review	Revision Number	Reviewed By	Next Review Date
03.10.2016	2	Nikki Smallwood	02.10.2017
19.10.2017	3	Nikki Smallwood	19.10.2018