W. R. SWANN GROUP

Ethical Trading Policy

Key Statement

The W. R. Swann Group manufactures and supplies surgical blades and handles throughout the world. We are fully aware of the responsibility we bear towards our customers, employees and the communities in which we work, so we have applied a strict set of ethical values to guide us in our business dealings.

- The Group ensures that there is no discrimination involved in recruiting staff, compensation, access to training, promotion or termination of employment based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

- The Group adopts an open attitude towards the activities of trade unions / works councils and their activities. Freedom of association and the right to collective bargaining are respected.

- The Group does everything in its power, in cooperation with its employees, to ensure safe and hygienic working conditions. All employees will receive safety and hygiene induction training at the commencement of their employment with the company. Employees have access to clean toilet facilities and drinking water. Responsibility for health and safety is assigned to a senior management representative.

- The Group ensures that all employees have the legal right to be employed in the UK.

- The Group pays wages and benefits that meet, as a minimum, national legal standards. All employees are provided with written information about their employment conditions, and about the particulars of their wages for the pay period concerned each time they are paid.

- The Group does not use forced, bonded or involuntary prison labour. Employees are not required to lodge deposits or their identity papers with the Group, and they are free to leave after a reasonable notice period. Overtime is always voluntary, not demanded on a regular basis or compulsory, and is compensated at a premium rate. All work-related activities are carried out on the basis of a recognised employment relationship established according to national law and practice. The Group ensures that working hours are not excessive and that they comply with national law. The Group's normal working hours do not exceed 48 hours per week, and overtime hours do not exceed 12 hours per week.

- The Group does not employ child labour of any sort. If young person's carry out work at the Group for reasons such as employment experience, the Group will ensure that a special young person's risk assessment is carried out and that young persons are not employed in hazardous conditions or at night.

- The Group and its employees are required to comply with the laws and regulations of the country in which we operate.

- We will maintain good employee communications through group-based information.

- We recognise that our responsibility for human rights and labour conditions encompasses our supply chain, and it is our aspiration that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions. We require all our critical suppliers to comply with local laws in their own countries concerning labour standards.

- The Group is committed to continually improving its Ethical Trading Initiative and Labour Standards Assurance Management System in line with this policy, and to meeting relevant measurable targets. The company will carry out an annual review of this policy to ensure its continued effectiveness.

Approved by.....Position.....MANAGING DIRECTOR.....Date.....120215.....