

Vision Matrix Ltd LSAS Ethical Procurement Policy

1. Policy

Vision Matrix distributes a broad range of medical products within the U.K and Ireland. As a Distributor of medical products, Vision Matrix recognizes, our obligation to provide our customers with high quality, professional goods and services at a competitive price.

Vision Matrix is committed to upholding an ethical labour policy which is appropriate in nature and scale to the organisation and in-line with its legal and moral obligations as defined by relevant law, employment legislation and International convention. The standards expected not only apply to those who are directly employed within the supply chain but also to members of the public and interested parties who have an indirect involvement within the supply chain.

To achieve this we continually assess and monitor our own performance and process controls and also those of our trading partners. Through this monitoring approach we aim to ensure that our standards are continually improving. Vision Matrix commits to making available sufficient resources for the implementation of this policy as appropriate to the nature and scale of its operations. The requirements detailed in this document must be sensitive to the rights and livelihoods of the workers it is aiming to protect.

Vision Matrix has made this policy publicly available (specifically via its website www.visionmatrix.co.uk/1LSAS) the Policy has also been communicated to all employees, contractors, sub-contractors and suppliers.

Scope of the Policy

Vision Matrix has applied this policy as it is a Supplier to NHS England via the Framework Agreement:

OEJU: 2020/S 178-431058

Complete Ophthalmology Solutions 2 Framework Agreement: Plus COS3 from 2025.

For this purpose, Vision Matrix has drawn up this Supplier Code of Conduct, which sets the standards for doing business with us. These ethical standards cover:

- Child labour
- Forced or compulsory labour
- Freedom of association and right to collective bargaining
- Discrimination
- Health and Safety
- Working hours
- Remuneration

• Child Labour

VM does not engage in or support the use of child labour. If VM engages any young workers (Work Experience) it will ensure that a suitable risk assessment is carried out, and that any young person is not exposed to any dangerous conditions, or not work more than 8 hours per day. 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 (reference: ILO Convention 138(7)).

• Forced Labour

VM 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.

• Freedom of Association and Collective Bargaining

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

• Discrimination

VM will not engage or support any form of discrimination in its employing of staff, salary, training, promotion, termination or retirement based on race or national or social origin, caste, religion, gender, sexual preference, political affiliations, age or other circumstance that could be classed as discrimination

Disciplinary Practices – VM will treat all employees with dignity and respect. VM shall not or tolerate the use of corporal punishment, mental or physical bullying or verbal abuse of personnel. No cruel or inhumane treatment is allowed.

- **Health & Safety**

VM shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to employee's health by minimizing the risk to its employees. All employees will receive safety and job training during their employment. Employees will have access to clean toilet facilities and drinking water. The health and safety responsibilities of VM have been assigned to the CSM.

VM expect our suppliers to strive to implement the standards of occupational health and safety at a high level. The supplier complies with applicable occupational health and safety regulations and provides a work environment that is safe and conducive to good health, in order to preserve the health of employees and prevent accidents, injuries and work related illnesses.

Compensation and Working Hours

- **Working Hours** VM shall comply with relevant laws and labour standards on working hours and holiday entitlement. VM's working hours do not exceed 48hours per week and overtime hours do not exceed 12 hours per week. VM ensure that all employees have the legal right to be employed in the UK.
- **Remuneration** VM shall comply with national laws and regulations relating to wages and benefits. All work associated activities are carried out on the basis of a recognised employment relationship established according to national law and practice

Business Continuity Planning

The supplier shall be prepared for any disruptions of its business (e.g. natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases). This preparedness especially includes disaster plans to protect both employees and the environment as far as possible from the effects of possible disasters that arise within the domain of operations.

Improper Payments/Bribery

The supplier shall comply with international anti-bribery standards as stated in the United Nations' Global Compact and local anti-corruption and bribery laws including The Bribery Act 2010. In particular, the supplier may not offer services, gifts or benefits to Vision Matrix employees in order to influence the employee's conduct in representing Vision Matrix.

Environment

VM is committed to protecting the environment both through our own actions and also by working with our suppliers. We will continue to focus on delivery high standards of service and quality of goods to our customers. We will comply with all regulatory and legislative requirements and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.

We expect our suppliers to strive to support VM climate protection goals through the products and services they deliver (e.g. by providing relevant data on climate protection). In this regard, we also expect our suppliers to take climate protection appropriately into account in their own operations, for example by setting climate protection goals for themselves and achieving them.

Business Partner Dialogue

The supplier shall communicate the principles stated in the Supplier Code of Conduct and detailed above to its subcontractors and other business partners who are involved in supplying the products and services described in the main contract. The supplier shall motivate such parties to adhere to the same standards.

Compliance with the Supplier Code of Conduct Vision Matrix reserves the right, upon reasonable notice, to check compliance with the requirements of the Supplier Code of Conduct. Vision Matrix encourages its suppliers to implement their own binding guidelines for ethical behaviour.

Vision Matrix policy in relation to labour standards as relevant to the organization itself, contractors, sub-contractors, suppliers and any other parties engaged through the supply chain is as follows:

- We shall comply to all Employment Laws relevant to our business
- We comply to the Health and Safety at work Act 1974.
- We comply with all other Employment legislation.
- Our compliance with the above is kept up to date using an external HR company
- We will work towards the ETI Base Code. This demonstrates compliance with 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 international, national and local law and practice
- We shall encourage all suppliers and contractors to adhere to the Ethical Trading Initiative as part of their respective contracts

2. Management Representative

The management representative assigned the responsibility of implementing an effective Labour Standards Assurance System (LSAS) is Sue Mitchinson.

The responsibilities of the Management Representative are as follows:

- To develop procedures to meet policy requirements
- To communicate labour standards issues to senior management
- To liaise with companies in the supply chain to undertake labour standard status reviews
- To set objectives and targets for labour standards assurance with plans for training, auditing and required action
- To liaise with companies in the supply chain to implement a plan of action to meet objectives
- To regularly review and improve the Labour Standards policy
- To implement training for staff involved with the LSAS

3. Labour Standards Status Review

Vision Matrix commit to undertaking a comprehensive Labour Standards Status Review; when contracting a new supplier and at regular routine visits to suppliers, to ensure that labour standards throughout our supply chain are satisfactory and continually improving. We recognise that if any contractor or sub-contractor were found to be using unethical or illegal labour programs, this would have a profound impact on the reputation and integrity of the company.

A labour standards status review will be carried out annually as part of the Annual Management Quality Review and ISO9001:2015 internal audit.

The above are monitored as below:

Vision (G) 1 LSAS\Forms\ VM-LSP2 LSAS Questionnaire.doc

Vision (G) 1 LSAS\LSAS20..\Overview for Suppliers & Manufacturers’/s

Labour standards are assessed to ascertain which standards apply to either the Company or our supply chain.

Labour Standard	Country	Status
NHS Supply chain LSAS	UK	Compliant
NHS Supply chain Code of Conduct	UK	Compliant
Equality Act 2010	UK	Compliant
Public Interest & Disclosure Act 1998	UK	Compliant
Bribery Act 2010	UK	Compliant
Health & Safety at Work 1974	UK	Compliant
Employment Act 2008	UK	Compliant
Ethical Trading Initiative 2014	UK	Compliant

4. Legal and Other Requirements

Vision Matrix commits to stay up to date with changes to relevant employment legislation through the use of an external HR company (ELAS Business Support).

If required by Suppliers Vision Matrix can make access available to its records with SAGE HR.

It is also a Vision Matrix requirement for our company to comply with UK employment laws and, to influence our suppliers wherever practicable, that they too need to conform to employment legislation as a requisite to supply Vision Matrix with goods and/or services.

It is the responsibility of the Management Representative to periodically review these requirements, to confirm our ongoing compliance. In addition, future/proposed changes in legislation will also be identified during that review, and records retained.

It is also the responsibility of the Quality Manager that those identified requirements (listed below) are kept up to date.

To ensure ongoing compliance with international legislation the Management Representative will access the relevant sources for updates. If updates are identified, we will contact the relevant supplier / manufacturer to ensure that the new legislation has been implemented accordingly.

The sources used to identify and review applicable legislation typically are as follows:

Advisory, Conciliation and Arbitration Service HSE (Health & Safety Executive)
UK Government Employing People Business & Human Rights Resource Centre Ethical Trading Initiative
International Labour Organisation United Nations Global Compact Office of the High Commissioner Business for Social
Responsibility British Medical Association
Social Accountability International Global Reporting Initiative Sancroft International
National Health Service National Archives
HR, health & safety and environmental consultancy services

Web Site Sources:

www.acas.org.uk
www.hse.gov.uk
www.gov.uk
www.business-humanrights.org
www.ethicaltrade.org www.ilo.org
www.unglobalcompact.org
www.ohchr.org
www.bsr.org
www.bma.org.uk
www.sa-intl.org
www.globalreporting.org
www.sancroft.com
www.nhs.uk
www.legislation.gov.uk

This procedure also identifies information on relevant employment and human rights legislation and other requirements as they apply to VM direct operations, suppliers and other parties in the supply chain.

These identified include:

1. ETI Base Code (& overseas)
2. Labour Standards Assurance System
3. Health & Safety at Work Act 1974
4. Bribery Act 2010
5. Environmental Protection Act 1990
6. Equality Act 2010 (as amended 2012)
7. Employment Promotion Act 1999 Germany
8. The French Labour Code 2009 France
9. The Labour Code 2006 (as amended 2012) Czech
10. NHS Supply Chain - Supplier Code of Conduct
11. BMA Ethical Procurement for General Practitioners

The relevant control document for our suppliers is the **VM-LSP2 LSAS Questionnaire** which requires the supplier to confirm that they comply with their national laws.

These examples are not intended to be exhaustive; however, they do provide a good foundation to help ensure that throughout our supply chain, labour abuses are not perpetrated. All of these examples are indeed available to our staff to help them understand, and if relevant to their role, how they might apply to them.

Up to date versions of each requirement can be accessed from the various applicable web sites listed above.

In addition, other documents & records may also be in place to support compliance, for example employees Contract of Employment; NHS Country Profiles etc.

Note 4: There is a wide variety of other regulations within the employment sector, which will be addressed if an incident (labour abuse) occurs within our supply chain and any corrective actions put in place if appropriate.

5. Objectives, Targets and Programs. Commitment to Continual Improvement

VM is committed to ensuring the achievement and improvement in all areas of its business.

Our approach to continuous improvement will be underpinned by providing a high-quality service, value for money and maintaining and monitoring performance, whilst administering continual improvements throughout the company.

This Policy will be subject to updates and amendments, as and when necessary. For internal measures the Policy will be reviewed at 12-monthly intervals.

Vision Matrix Ltd is also committed to:

- To be compliant with other relevant legal requirements for our Notifiable body
- Ensure that key contractors, subcontractors and suppliers are aware of this policy
- Make available time and resource for the implementation of this policy
- Ensuring that our suppliers, in particular overseas suppliers, adopt labour practices including a fair and honest approach to their employees and anyone whom they trade with
- VM recognises the importance of corporate responsibility towards sustainable objectives and of maintaining high standards of social, ethical and environmental conduct
- VM has built in contingency plans for Business Continuity – these are reviewed on a 12 monthly basis
- VM is continually building in capacity for carbon reduction, enforcing recycling processes (as far as possible) and managing the amount of waste that the company produces
- VM are innovative with their product design and can deal with bespoke customer requirements. Therefore, allowing the customer to be provided with their specific requirements, thus eliminating wastage, whilst maintaining an affordable and quality product

Vision Matrix commit to producing a Corrective Action Report (CAR) where necessary following each labour standards status review. The CARs will be reviewed by senior management during the Annual Management Quality Review, in line with the Quality Manual, to determine whether the company is on target to reach their objectives and to ensure these objectives are still appropriate. This will ensure that all relevant personnel will be kept up to date with the development of the LSAS program.

The aim of this policy is to promote understanding and awareness of employment laws and ethical standards. By detailing our labour standards to all parts of our supply chain we hope to develop better ethical standards by motivating our suppliers to adhere to it. It also describes the standard required of potential future suppliers.

Vision Matrix labour standards objectives and targets are available in the annual management review.

Labour Standards Assurance – Questionnaires

VM will request LSAS Questionnaires to be completed for new suppliers, and will revisit and request updated questionnaires at 12 monthly intervals. Questionnaires are to be completed by Suppliers within 17 days (from date Questionnaire sent). We will aim for 90% of all Q & A LSAS questionnaires to be completed and returned within 17 days. We will then give a further 10 days for any company who has not responded within the first period. Any supplier failing to respond after the second 10 day period will be put on hold and no purchase orders will be placed with that company until all information on the LSAS is received to a satisfactory standard.

The above objectives are monitored on the VM LSAS Overview Sheet and reviewed in the company's annual management review every December.

Vision (G) 1 LSAS\LSAS20..Overview for Suppliers & Manufacturers. x/s

6. Roles and Responsibilities

The Management Representative (Sue Mitchinson) shall liaise with the Managing Director (Glynn C. Allen) to develop the LSAS and present any developments at regular intervals to senior management. Members of staff involved with the LSAS shall be identified using the training records system and skills matrix. Target setting for staff involved with the LSAS shall be incorporated into yearly personnel reviews.

Resources relating to the LSAS will be available to all involved staff through the shared 'G' Drive **Vision (G) 1 LSAS**

The LSAS programme shall be communicated internally which includes issuing LSAS related policies. In addition, the relevant policies shall also be sent out to all suppliers. Roles and responsibilities are reviewed at the annual management review meeting.

7. Competence, Training and Awareness

Vision Matrix commit to the training of relevant staff in order to be competent with handling the labour standards programme. Relevant Staff are those involved in procurement and new product development. persons involved with the LSAS should:

- Have a good understanding of how Vision Matrix operates with knowledge of the supply chain
- Be in a position to contact suppliers and build a relationship with them
- Be trained in the LSAS requirements

Training for the LSAS is implemented as part of Vision Matrix Training Checklist, which keeps a record of the training levels of all the staff at the company. Training reviews and development plans for the LSAS will be included as part of Vision Matrix current training system. Plans for training (needs assessment) will be recorded in the minutes of the Annual Management Review.

8. Communications

Since the LSAS is embedded into the current Quality Management System, the existing training systems, quality systems and recorded communication will be used to address LSAS issues. We will use the CAR system to log and monitor any adverse allegations, complaints or alerts relating to the LSAS. Minutes of meetings regarding findings and issues will be recorded and made available.

9. Documentation and Records

Documentation and records in relation to the LSAS shall be kept using standard document and record keeping procedures in line with other Quality Documents.

10. Operational Control

For the direct operation of the company, the LSAS procedures involved with controlling the labour standards of the company and addressing any risks or breaches of this policy that may be posed are available on the G Drive in the 1 LSAS folder.

The senior management of Vision Matrix have identified the following **critical control points** for labour standards in the supply chain:

- 1 Appointing a new Supplier.
- 2 Identifying non-conformance and agreeing corrective actions.
- 3 Amending purchase orders.
- 4 Supplier performance reviews.
- 5 External audit LSAS Auditor, QA international & ELAS.
- 6 Purchase and selling pricing.
- 7 Country specific potential risks ie: illegal workers, No Contracts of Employment, excessive weekly hours etc.

In addition to the above other Critical Control Points may be identified during our Labour Standards Review process. Periodically critical control points may be verified.

11. Supply Chain Management

Vision Matrix commit to monitoring and maintaining the labour standards risks and issues in the company's supply chain through the distribution and communication of the company's labour standards policies along with the ongoing assessment of whether these standards are being met. This will occur using assessments at the control points stipulated in Section 9.

New suppliers must meet Vision Matrix initial approval that outlines the standards to which the supplier is expected to maintain as part of their contract. These standards comply fully with those required by the LSAS. Reviews shall be taken at routine visits to suppliers to ensure they continue to comply fully with the LSAS. The findings of supplier visits shall be noted in the Annual Quality Management Review. The Quality Manual details the KEY companies involved with manufacturing Vision Matrix main products it is an established Quality Document available to all staff. The above objectives are being monitored via:

Vision (G) 1 LSAS\Forms\ VM-LSP2 LSAS Questionnaire Issue.doc

Vision (G) 1 LSAS\LSAS20..Overview for Suppliers & Manufacturers.x/s

12. Emergency / Critical Issue Response

Vision (G:) ISO9000-2015\Operations\VM LSAS Ethical Procurement Policy

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Vision Matrix have identified aspects of the ETI Base Code that are of particular importance for meeting minimum levels of labour standards. Sections 1.1, 1.2, 4.1 and 9.1 are regarded by Senior Management of Vision Matrix as statements that justify emergency response.

VM shall identify and document responses to significant labour standards issues and risks. The procedure adopted shall be appropriate to the issue and also reflect the current risks.

Any concern or risk reported will be investigated in guidance with VM Emergency Breach Procedure.

Vision (G) 1LSAS\Procedures\ VM LSAS Supplier Audit including Emergency Breach Procedure.doc

LSAS Abuse

Suppliers, Employees and Contractors should telephone VM on 01423 705058 or email sue@visionmatrix.co.uk.

CSM – Sue Mitchinson Telephone 01423 705058 alternatively Glynn Allen 07511 691411.

Once a concern or incident has been reported, VM will make preliminary enquiries and decide if further investigation is needed following the LSAS Supplier Audit including Emergency Breach Procedure.

Vision (G) 1LSAS\Procedures\ VM LSAS Supplier Audit including Emergency Breach Procedure.doc

VM will decide whether this should be conducted internally or whether the matter should be referred externally. Where possible, VM will advise of the outcome of any investigations.

Any supplier, supplier employee or contractor who does report their concerns will not be victims or treated less favourable in anyway as a result.

Deliberately raising false or malicious allegations is not acceptable and will be viewed extremely seriously by VM.

Emergency Response comprises a request for a written Corrective Action Report (CAR) within 14 days that is approved by all parties involved. Should this CAR be deemed unacceptable then resourcing of production from within Vision Matrix existing supplier base shall be implemented within 30 days of the initial breach of the above minimum labour standards

Whistleblowing

VM will respond to allegations, complaints or other alerts about labour standards issues as part of our whistle blowing procedures.

Whistle blowing can be reported directly to the Company Directors at glynn@visionmatrix.co.uk or liz@visionmatrix.co.uk. Or to protect anonymity, in writing to Glynn Allen or Liz Overend at Vision Matrix Ltd, 31 East Parade, Harrogate, HG1 5LQ. In line with current legislations, below is a telephone number for the UK and also a Link to an International Freephone listing of Whistleblowing Hotlines for all countries (where available) where concerns regarding any labour standard issues can be discussed.

U.K website [Contact our Advice Line - Protect - Speak up stop harm \(protect-advice.org.uk\)](http://www.protect-advice.org.uk) Telephone: 020 3117 2520
email: whistle@protect-advice.org.uk

<http://www.expolink.co.uk/whistleblowing-hotline/PDF/International-Freephone-listing.pdf>

13. Performance Monitoring and Measurement

Vision Matrix commit to monitoring the performance of the LSAS during the Annual Quality Management Review as part of resource management, assessing the progress of the program against the latest CARs where appropriate and setting relevant targets, in addition to those stipulated in this policy, to ensure the progression of the LSAS against our objectives. Progression of parties in the supply chain shall be measured against the level of compliance with the ETI Base Code.

ETI Base Code

Please see link below:

www.ethicaltrade.org/eti-base-code

14. Corrective Action

The current CAR Quality System will be used to document improvements raised from labour standards audits.

15. Management Review

Senior management will formally review the labour standards program during the Annual Quality Management Review.
The below named company duly signed, dated and stamped this LSAS document and agrees that it complies and fulfils its commitments outlined in this document.

NameGlynn Allen.....

Signature..........

Company Name & Address

Vision Matrix Ltd
31 East Parade
Harrogate
North Yorkshire
HG1 5LQ

Company Stamp

Date.....11th April 2024.....