



Abena UK Limited Labour Standards Assurance System (LSAS) Policy

1. Introduction

The Abena Group A/S (Abena) is a family-owned manufacturer and wholesaler of health care solutions and related products. Our assortment primarily revolves around incontinence and health care solutions, but also includes a wide range of related products such as disposables, protective wear, gloves, waste management, food service, paper and cleaning supplies. Our customers are nursing homes, hospitals, incontinence clinics, doctor's offices, consumers and a range of businesses operating in various related industries. We understand the responsibility we bear towards our customers, employees and the communities in which we operate and that may be impacted by our operations. Abena UK Limited is committed to responsible business conduct among its facilities, suppliers, and contractors that meet or go beyond applicable laws and regulations, in all geographies in which we operate, safeguards health and safety at work, protect the environment and supports the contribution of business to achieving sustainable development.

2. Purpose and rationale of this policy

This policy aims to provide clarity to our employees, customers, suppliers, subcontractors and other stakeholders concerning Abena UK's commitment and approach to respecting human rights and labour standards throughout our direct operations (where we respect and promote labour standards through our own employment policies and practices) and the parts of our supply chain covered by the requirements of the UK National Health Service Supply Chain Labour Standards Assurance System requirements.

3. Policy Scope and Responsibilities

The scope of this policy relates to labour standards covered by the LSAS includes standards relating to employees within Abena UK Limited and workers within our global supply chain.



Abena UK Limited has designated the Tender Manager to develop and implement this policy. They are supported by all sectors of management and approved by the Managing Director.

4. Our commitment to Labour Standards

This policy was developed in order to meet the guidelines and standards established by the UK's Labour Law, WTO, ILO, NHS Supply Chain Code of Conduct. All these strategic frameworks provide a guideline on the legal relationship between workers, trade unions, and protecting labour laws across the whole of the supply chain in the UK and outside the UK.

Abena UK policy in relation to labour standards as relevant to the organisation 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 Act 1974 – as outlined by the Employee Handbook

We comply with all other Employment legislation – as outlined by the Employee Handbook

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.

5. Objectives

Ethical Procurement

Abena UK Limited believes that human rights, which includes freedom from slavery and human trafficking, are an absolute and universal requirement and as such are committed



to upholding those rights as expressed in the *International Bill of Human Rights* and the *International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work*.

Our ethical objective is to ensure that people in our supply-chain are treated with respect and have rights with regards to employment, in relation to:

- ❖ Child labour
- ❖ Forced/bonded labour
- ❖ Non-discrimination
- ❖ Non-harassment
- ❖ Living wages
- ❖ Working hours
- ❖ Working conditions
- ❖ Freedom of association/collective bargaining

6. Expectations towards our Suppliers

Our goal that the working conditions throughout our supply chain meet internationally accepted standards of human rights and working conditions.

Abena's code of conduct is based on UN's Global Compact (UNGC) and the BSCI. It is very important that our partners follow the same standards we do, and we always encourage our suppliers to act in a responsible and fair manner. From our more than 1,200 suppliers worldwide, 85% have signed the UN Global Compact, and in doing so, they commit themselves to complying with a list of demands in regard to nature, ethics, social responsibility, safety, and finances.

7. Compliance and verification procedures

The assurance and verification procedures Abena UK has in place to implement, and monitor the implementation of the policy include:



- ❖ Supplier Self-assessment surveys and document verification for compliance against the Labour Standards Management System.
- ❖ Internal desk audits.

Abena UK Limited commit to remain up to date with changes to relevant employment legislation through the use of an external HR company. Relevant employment legislation with regards to Abena UK Limited's direct operations is outlined in the Employee Handbook which is issued to all employee's as part of their induction upon employment.

8. Communication Training and Resources on LSAS Policy

This policy will be made available to the public on our website and will be communicated to internal employees via email and located on our internal Shared Drive. It will be available to suppliers impacted by the scope of our Labour Standards Assurance System through communication via Purchasing and Supplier Management. All UK staff impacted by this policy will be trained on applicable Labour Standards.

Abena UK Limited is committed to making necessary human, financial and other resources necessary to monitor, review and implement this policy.

9. Ethical Conduct and Reporting

Abena UK Limited is committed to promoting ethical conduct and legal compliance with our own employees and operations as well as throughout our supply chain, including our to our suppliers and contractors worldwide. Abena UK Limited aims to foster an environment of open communication where concerns can be expressed directly to.

Deborah Parsons, Tender Manager : dpa@abena.co.uk

Julia Harrison, Managing Director: jha@abena.co.uk

Telephone at +44 (0)2476 854 800

There is also a Whistleblowers link on our internal ifonet for anonymity if required.



9. Continual Commitment to the policy review

Abena UK Limited is committed to continually improving its Labour Standards Assurance Management System in line with this policy, and to meeting relevant targets to drive improved performance. The policy will be reviewed on an annual basis to ensure its continuing focus, relevance, and alignment to the legal requirements in the jurisdictions where we operate.

Julia Harrison
Managing Director

A handwritten signature in black ink, appearing to read "Julia Harrison". The signature is fluid and cursive, with a long, sweeping tail that curves back towards the start of the name.

28th January 2021