



KCI Medical Ltd

Labour Standards Assurance System Policy

The following Policy is approved by:

Responsibility	Name	Title	Sign	Date
Top Management	Margo Barry	General Manager	<i>Margo Barry</i>	7/5/2019.
LSAS Management Representative	Louise Doyle	Customer Service, Contract & Tender Manager	<i>Louise Doyle</i>	7/5/19.

1. Scope

This Policy applies in its entirety to KCI Medical Ltd (UK & Ireland) and all employees thereof. Some aspects (as described throughout this policy) apply specifically to UK related operations.

KCI Medical Ltd operates from the following addresses:

Head Office: 2050 Orchard Avenue
Citywest Business Campus
Dublin 24, Ireland

UK Distribution: Unit 12 Premier Park
Trafford Park Road
Manchester, M17 1GA
United Kingdom

2. Introduction

KCI Medical Ltd (also known as Acelity) is committed to upholding an ethical labour policy to ensure appropriate labour standards throughout its supply chain and drive improvements if required.

KCI Medical Ltd has developed this Labour Standards Assurance System Policy (LSAS Policy) as an overview of the LSAS in place within the company and a demonstration of the company's commitment to the relevant principles set out by the International Labour Organisation (ILO) in the of the United Nations Compact - A guide for business (print version ref. ISBN: 978-92-2- 121823-4). Namely:

- Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights.
- Principle 2:** Businesses should ensure that their own operations are not complicit in human rights abuses.
- Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- Principle 4:** Businesses should uphold the elimination of forced or compulsory labour.
- Principle 5:** Businesses should uphold the effective abolition of child labour.
- Principle 6:** Businesses should uphold the elimination of discrimination in respect of employment and occupation.
- Principle 10:** Businesses should work against all forms of corruption, including extortion and bribery.

Note that the 'Environment Principles' (7, 8 and 9) are considered outside the scope of the LSAS.

LSAS is relevant to KCI Medical Ltd due to the scope of its business activities which includes the selling of devices and dressings to the UK wound care market via NHS Supply Chain.

Appropriate resources are made available to ensure the Company's commitment to adhering to LSAS in terms of time, personnel and financial resources.

This Policy is permanently available to all KCI Medical Ltd employees and is reviewed at least annually

for appropriateness during the Management Review Meeting.

All KCI Medical Ltd employees receive training against this Policy.

To ensure the Company's LSAS Policy is a robust and effective Policy, Intertek will be commissioned to carry out an independent assessment to ensure it complies with the relevant LSAS level.

3. Policies & Resources

KCI Medical Ltd is an affiliate business within the global Acelity corporate structure. As such, the parent company (Acelity) provide global corporate direction and over-sight, in part, through the application and maintenance of global policies and procedures as well as direct operational, legal, compliance and regulatory support.

Acelity is the sole supplier of medical products to KCI Medical Ltd. As such, the LSAS implemented for KCI Medical Ltd reflects and relies upon the corporate ethics and labour standards controls of the parent company and their on-going commitment to sourcing materials, parts, components and services through

In terms of suppliers to KCI Medical Ltd, Acelity is made up of four manufacturers of Medical Device products as follows:

Systagenix Wound Management Ltd.

Gargrave
North Yorkshire
BD23 3RX
United Kingdom

Crawford Healthcare Ltd.

King Edward Road
Knutsford
WA16 0BE
United Kingdom

KCI USA Inc.

12390 West Interstate 10
San Antonio
Texas 78249-2248
U.S.A.

Core Values

Acelity has developed a set of core values which guide all employees in every decision. The core values are the foundation of how Acelity carries out business globally and are the basis of all corporate communications, both internal and external. The core values are:

Customer First: We provide the best solutions for customers & patients

Integrity: We are accountable for our actions & do what is right

A Will to Win: We love to compete & enjoy being the best at what we do

One Acelity: We are one team executing with a global mindset

Code of Conduct

The [Acelity Code of Conduct](#) (the Code) is the ethical foundation of our business and supports our values. It is published on the Acelity website in 11 languages for public access.

Our values are the beliefs we all share, that drive our company personality, culture, and priorities . They provide a framework for making decisions and define how Acelity employees are expected to conduct themselves in a professional and responsible manner.

Our values serve as our compass in how we achieve our vision of restoring people's lives. They are also the reason our stakeholders, including customers, employees, business partners, and shareholders, place their trust in us. We place the customer first by providing the best solutions for healthcare providers and patients. We operate with integrity, being accountable for our actions and doing what is right everywhere and every day. We demonstrate a strong will to win as we compete fairly and enjoy being the best at what we do. Ultimately, we are one Acelity, one team, executing with a unified global focus. The Acelity Code of Conduct contains important information and resources to guide all employees in conducting business legally, ethically, and responsibly in accordance with our core values.

The Code is organized in four major categories, representing our commitment to our key stakeholders:

- Commitment to Each Other
- Commitment to Customers
- Commitment to Shareholders
- Commitment to Community

The Code includes a section covering the responsibilities of Acelity business partners as follows:

'Acelity believe in doing business with business partners such as suppliers, contractors, joint venture partners, agents, sales representatives, distributors, and consultants, who share our values and approach to doing business. We expect our business partners to adhere to all applicable laws and regulations, and review, understand, and act consistently with the principles set out in this Code.'

It goes on to state:

We deal with many suppliers ...//... Our relationships with suppliers are based on lawful, efficient, and fair practices, including observation of human rights and eradication of human trafficking and slavery. We expect our suppliers to obey applicable laws, including laws that require them to treat workers fairly and free from coerced or forced labour, unlawful harassment or offensive conduct, provide a safe and healthy work environment, protect environmental quality, and provide products and services according to design and contract requirements, and applicable quality standards.'

Human Trafficking Statement

The Acelity [Human Trafficking Statement](#) is found on the external corporate website outlining the commitment to treating our own employees fairly and ethically along with our expectation that our business partners support ethical labour practices which include the eradication of coerced or forced labour, human trafficking, and slavery in our supply chain.

Contractual Clauses on Suppliers

All Acelity supplier agreements and contracts include requirements associated with the Prohibition Against Human Trafficking as well as general compliance and ethical requirements. Compliance with these specific clauses of the agreements is continuously assessed by Acelity through strictly managed supplier audit and monitoring activities.

Alert Line

In order to ensure that any Acelity employee can raise concerns relating to Labour standards, without concerns relating to possible consequences, a global network of alert lines has been created. The numbers are listed in the Code (public website) and also the Acelity Intranet site.

Trade Association Affiliation

Acelity are active members of numerous local country trade associations (including ABHI in the UK). In addition Acelity maintain corporate membership with AdvaMED (USA) and MedTech Europe (Europe) at regional level. As such Acelity and all affiliates are bound by the ethics programs dictated by these organisations and are answerable to those trade associations with regard to ongoing and demonstratable compliance.

Specific examples of these programs are as follows:

- The Association of British HealthTech Industries (ABHI) Code of Business conduct ([link](#))
- The MedTech Europe Code of Ethical Business Practice ([link](#))
- The Advamed Code of Ethics ([link](#))

Employee Handbook

Within the KCI Medical [Employee Handbook](#), there are policies on topics such as equality, ethical conduct in the workplace and dignity at work as well as Whistleblowing procedures and our Alert line contact details.

The local UK [AlertLine](#) is a confidential platform for employees to report areas of concern on topics such as violations of the Code of Conduct, Antitrust, fair training or violations of law etc.

Training and Awareness

ComplianceWire is Acelity's global learning platform. Mandatory training is rolled out via the system to appropriate employees, on topics such as:

- Acelity Code of Conduct
- MedTech Europe Code of Ethical Business Practice
- Reporting Violations to the Code of Conduct
- This Policy

Operational Compliance

KCI Medical Ltd have generated procedures by which the LSAS will be implemented within the business. The procedures are subject to the document control and training requirements associated with the ISO 9001:2015 quality management system.

4. Revision History

Rev	Responsible	Reason	Date
1	Paddy Curtin	First issue, to demonstrate LSAS implementation	May 2018
2	Louise Doyle	Change management representative to from Paddy Curtin Louise Doyle	September 2018
3	Louise Doyle	General update, to demonstrate development and maturity of LSAS. Transfer of operational aspects to procedures	April 2019