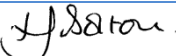
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ETHICAL TRADING POLICY

Introduction

Bolton Surgical Limited understands the responsibilities and challenges involved in ensuring the highest social, ethical and environmental standards are maintained within our own business operations and throughout our supply chain.

We therefore recognise and support the requirements of ETI Base Code (*reference 1*) which is founded on the conventions of the International Labour Organisation (ILO) (*reference 2*) and is an internationally recognised code of labour practice.

Scope of Policy

To provide and maintain Ethical Trading assurance throughout the Bolton Surgical supply chain in respect of the manufacture, supply, distribution, repair and maintenance of surgical instruments and accessories.

This Policy describes our ethical values, minimum standards and the basic principles we expect from ourselves, our partners and suppliers.

We recognise that our responsibility for Ethical Trading encompasses:

- Bolton Surgical Site –performance in accordance with UK and EU regulations.
- Supply Chain – We will use our best endeavours to minimise the risk of working conditions throughout our supply chain failing to meet internationally accepted standards of Ethical Trading.

Ethical Trading Principles Underlying this Policy

This Ethical Trading Policy has been developed in accordance with international standards as set by the:


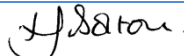
- ETI Base Code (*reference 1*)
- International Labour Organisation (ILO) (*reference 2*)

Bolton Surgical Limited requires that all its operations seek to abide by the following:

1. Employment is freely chosen

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.

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2. Freedom of association and the right to collective bargaining are respected

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

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

6.1 Working hours must comply with national laws, collective agreements, and the provisions below, whichever affords the greater protection for workers.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment.

6.4 The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety;
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.


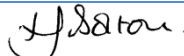
7. No discrimination is practiced

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or homeworking arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

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9. No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Environmental Practices

Suppliers should provide products to Bolton Surgical and conduct their business operations in a way that protects and sustains the environment in accordance with applicable laws and regulations. Suppliers are encouraged to reduce excess packaging, use recycled and non-toxic materials where feasible.

Gifts

Bolton Surgical policy prohibits its employees from accepting any gifts, gratuities or other benefits that go beyond the common courtesies usually associated with business practices from any supplier or potential supplier to Bolton Surgical or that exceed token or nominal value.

Conflicts of Interest

All Bolton Surgical employees are expected to avoid any investment, interest or association which interferes, might interfere, or might be thought to interfere with the employee's independent exercise of judgment in Bolton's best interest. Bolton Surgical employees are required to disclose any possible conflicts of interest to their relevant manager. Similarly, suppliers are required to disclose any possible conflict of interest to the Bolton Surgical employee(s) with whom they are negotiating or, if the possible conflict involves such persons, to the appropriate member of Bolton's management.

Confidentiality

All suppliers must keep confidential all trade secrets, designs, data, know-how or other information which the supplier knows or should know is considered confidential by Bolton Surgical, including, but not limited to, designs, sketches or prototypes for products that have not yet been introduced, engineering drawings, the financial terms of any agreement between the supplier and Bolton Surgical, information concerning Bolton's marketing plans, and any other information that is not readily available to the public.

Business Continuity Planning

All suppliers shall be prepared for any disruptions to 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.

Business Partner Dialogue

All suppliers will communicate the principles detailed within this Ethical Trading Policy to their subcontractors and other business partners and motivate such parties to adhere to the same standards.

Our Commitment

Bolton Surgical Limited commits:

- To comply (within our Company) with the principles contained within the Ethical Trading Initiative Base Code.
- To flow down the Ethical Trading Policy to all suppliers.
- To ensure all suppliers complete relevant Assessment Questionnaires & conduct associated Risk Assessments.
- To flow down to suppliers any NATLEX updates relevant to them for the countries they operate within.

Management Systems

The Board of Directors and top management shall define in writing the Company's Corporate Social Responsibility (CSR) Policy and display this policy in a prominent place within the business premises.

This policy will be reviewed annually within our Quality Management review process.

References:

Ref No.	Name of reference	Source
1	ETI Base Code	https://www.ethicaltrade.org/eti-base-code
2	International Labour Organisation (ILO) Conventions	https://www.ilo.org/resource/ilo-conventions

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