



JR Biomedical Ltd.
OpTIC Technology Centre
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Ethical Trading Policy

JR Biomedical Ltd is committed to operate all activities within the spirit and letter of all laws and regulations affecting its businesses and employees. Employees must exercise the highest level of integrity, ethics, and objectivity in their actions and relationships which may affect the Company. Employees must not misuse their authority or influence of their positions in these relationships. Moreover, an employee has the duty to act in the best interest of the company at all times.

The principles adopted by JR Biomedical in this policy document are based on the International accepted standards set out in the Ethical Trading Initiative (ETI) Base Code of Labour Standards.

JR Biomedical will, as far as is reasonably practicable, ensure that they and their suppliers comply with the stated policy requirements. Suppliers shall at all times comply with this code and with all applicable national and international laws, regulations, codes and standards, both in the country in which the supplier works, and in the country in which the product and/or services are sourced/ provided. These requirements are in addition to our standard requirements for products supplied to be safe, compliant with all appropriate regulations and of good quality. All suppliers are required to comply in all respects with our ETC which is referenced in our Supplier contracts Terms & Conditions.

Employment is freely chosen

There is no forced, bonded or involuntary prison labour. Workers are not required to leave deposits or their identity papers with their employer and are free to leave their employer after a reasonable notice.

Freedom of association and the right to collective bargaining are respected

Workers have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organisational activities. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace. 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.



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Working Conditions Are Safe and Hygienic

A senior management representative shall be responsible for Health and Safety, and a safe and hygienic working environment shall be provided. JR Biomedical has a company health and safety policy, appropriate risk assessments have been performed and adequate steps taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work. All employees shall receive appropriate health and safety training, and such training shall be repeated for new or reassigned workers. All employees are provided with access to clean toilet facilities and to safe drinking water, and clean facilities for food storage shall be provided.

Child Labour Shall not be Used

There shall be no use of child labour which shall be exploitative or shall jeopardise the health, safety, educational development or morals of any child. Persons under 18 shall not be employed to work at night or in hazardous conditions, and as a minimum meet National legal Standards. These policies and procedures relating to Child Labour shall conform to the provisions of the relevant International Labour Organisation (ILO) Standards.

Living Wages Are Paid

Wages and benefits paid for a standard working week must meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. 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. 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.

Working hours are not excessive

Working hours must comply with national laws, collective agreements, and the provisions defined in the clauses below, whichever affords the greater protection for workers. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. All



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

No Discrimination Is Practiced

There shall be 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, or political affiliation.

No Harsh Or Inhumane Treatment Is Allowed

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

No bribery or corruption is permitted

No bribes shall be paid or accepted to give or receive business.

Follow good environmental practice

To meet all relevant national and international environmental laws and regulations and to continuously improve environmental practice, as detailed in the Company's Sustainability Policy.

Dr John Rees
Managing Director
JR Biomedical Ltd.

Date: 16th June 2017