

Nottingham Rehab Ltd – Ethical Code of Conduct – Updated April 2022

Nottingham Rehab Ltd (trading as NRS Healthcare) aims to work with suppliers, factories and service providers from a position of trust, partnership, honesty, respect and teamwork. We also are clear that we have a role to play beyond our business: we live in communities, and have a duty as citizens to create and maintain high standards for ourselves and our partners so all involved in our work are valued and our environment is maintained.



INTEGRATED
COMMUNITY
EQUIPMENT
SERVICES
(ICES)



TECHNOLOGY
ENABLED CARE
SERVICES
(TECS)



CLINICAL
SERVICES



WHEELCHAIR
SERVICES



SUPPLY OF
PRODUCTS AND
SERVICES



DAILY LIVING
AIDS THROUGH
OUR RETAIL SITE

Our Policies

Through our policies NRS expect all our partners to adopt the same principles whether they provide a good or service within any of our business sectors and to continue to work with us to continuously improve on standards. These outline the minimum expectations.

Labour Provision & Working Conditions

- Freedom of association & collective bargaining – all employees are free to form or join a union which pertains to the protection of the terms and conditions of the employment of employees such as wages, hours of work, working conditions and grievance procedures, as far as local laws allow.
- Elimination of forced or compulsory Labour. Forced, bonded or compulsory labour is not acceptable – employees shall be free to leave at the end of their working day and free to leave to work for others following reasonable notice. Employees are not required to lodge deposits or identity papers etc. with their employer.
- Child labour. There will be no recruitment of child labour. Work undertaken by people aged 16 years or younger without consideration for their personal development, safety, education or health is prohibited.
- Slavery. NRS Healthcare support the Anti Slavery Act 2015 and other similar provisions. Regardless of location, Partners must provide copies of their policies and practices in this area.
- Risks. Factories are required to carry out risk assessments to understand areas of vulnerability, raise awareness internally & externally to establish clear policies.
- Exploitive labour practises. NRS prohibits any exploitive labour practises or criminal conduct, directly or by association.
- Working hours. Working hours must comply with national laws collective agreements.
- Time off. Works shall be provided with at least one day off in every seven-day period and holidays should be granted in accordance with local laws.
- Employee conditions. No harsh or inhumane treatment is allowed. All employees must be treated with respect and dignity.

Discrimination

- Elimination of Discrimination in respect of Employment and Occupation. Discrimination based on factors not relevant to the terms of employment is prohibited. Examples of attributes considered not relevant include race, religion, gender, sexual orientation, disability, ethnicity, height, weight and age. If the person can do the job, they should not be discriminated against.

Health and Safety

- Suppliers and service providers must commit to continuous improvement of factory and service standards as well as improving conditions in the workplace for people associated with the production or provision of product and services on NRS's behalf.
- A safe, hygienic working environment must be provided to workers and include workers being trained and have their training recorded on matters of health and safety within their specific workplace environment.
- Workers are to have access to sanitary facilities that are clean and access to water.
- First aid provision must be available for all workers.
- NRS do not accept factories that are housed in vertically shared production sites.
- Adequate steps shall be taken by any employer acting on behalf of NRS either through provision of a product or service to minimise risk of accidents and injury to health that could occur in the course of the person's work.

Audits

- Audits of all suppliers of NRS branded product or supplies of services to NRS take place at least every two years (more often if required) to assess compliance with this code.
- Audits are carried out at all sites that hold stock for NRS.
- Audits must be either unannounced or semi unannounced within a 2 week window.
- NRS may carry out their own unannounced audits either with its own staff or a 3rd party acting on the behalf of NRS to ensure that none of the codes of conduct are breached.
- NRS Healthcare reviews the effectiveness of its policies and procedures in the supply chain at least annually, including audits by our own visiting colleagues and will publish updates as requirements develop.
- Due to Covid19 restrictions over the past 24 months NRS colleagues have been unable to undertake the usual number of overseas visits, however our agents have visited and audited sites on our behalf. Once travel into the local areas are allowed, NRS will undertake its own factory audits to ensure audit standards are maintained.

Environmental Expectations

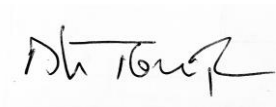
- NRS is committed to its target of Carbon net zero by 2030. This includes Scope 1, 2 & 3.
- Suppliers should be aware of their carbon footprint and commit to a strategy to reduction inline with the NRS target of 2030 net zero.
- Suppliers should commit to reducing the level of packaging applied to their product and where possible utilise the maximum amount of recycled material within the creation of the product and packaging ensuring product quality and clinical capability is maintained.
- Suppliers must manage waste in line with applicable environmental laws and regulations and reduce the percentage of waste moving to landfill.
- All suppliers should commit to reducing their requirement on water, energy & emissions as well as the amount of waste they create.
- Suppliers are expected to create product with reusability in mind and an expectation to maximise the product life expectancy know that NRS will reprocess product and recycle for reintroduction into the community.

Supplier Compliance

- We expect our Supply Partners to ensure their practices, and those of their suppliers, are supportive of our approach
- We expect to purchase goods that have been produced and delivered with minimum impact on the environment and with due regard for social issues such as employment conditions and welfare
- NRS Healthcare recognise Supply Partners with BSCI, SEDEX, SMETA, SA 8000, ISO 14001, ISO 45001 etc. accreditations/certification. If you do not hold these, we reserve the right to have an independent agency visit and audit factories to ensure compliance with NRS Environment & Social requirements. The supplier shall
- As a result, NRS Healthcare reserve the right to avoid partnerships with organisations that do not achieve, or do not make efforts to achieve, compliance with the following minimum standards for their operations, employees and supply chain in accordance with International Labour Organisation (ILO) conventions and other public sector commitments.
- The supplier agrees that any non-compliance issues raised by audits and/or inspections will be agreed with NRS and include a timetable for the rectification points to be implemented to ensure compliance going forward.
- The supplier must declare all production facilities to NRS to ensure audits and compliance can be audited. If any factories sub contract work, it must be authorised by NRS prior to taking place and the NRS to be provided a commitment in writing that the sub contractor will adhere to all of the policies and code of conduct.

Whistleblowing

- NRS operate a Whistleblowing policy to ensure that any concerns of malpractice within our own business or that of our suppliers and partners can be investigated without bias and confidentially.



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Alan Thompson
CEO

Nottingham Rehab Ltd