

To whom it may concern:

Code of Conduct: Main principles For Altomed and Suppliers.

We are fully aware of the responsibility we bear toward our customers, employees, and the communities in which we work. Thus, we have given ourselves a strict set of ethical values to guide us in our business dealings.

Altomed has adopted this policy and we expect all our suppliers, to adhere to the same ethical principles. This Code of Conduct sets the standards for doing business with us.

Altomed will continue to review and improve this policy, taking into consideration changes in legislation, and we expect our suppliers to continually improve their respective policies and provide sufficient resources to meet these policies. We welcome any policy improvements from interested parties (employees, customers, suppliers, stakeholders etc).

This policy covers all sections of the Labour Standards Assurance System, as set out by the NHS, these include Labour Standards Policy, Management Representative, Status Review, Legal Requirements, Roles and Responsibility, Training, Communication, Documentation, Operational Control, Supply Chain Management, Emergency Response, Performance Measurement, Corrective Action, and Management Review.

Main Principles:

Laws and Ethical Standards

The Company shall comply with all laws applicable to its business. The Company should support 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 national law and practice. The company shall comply with local laws in which they are based/ where the products are sourced.

This especially applies to:

Child Labour

The Company shall employ no children under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from the completion of compulsory schooling or training, or if the employment would be harmful to their health or development (*reference: ILO Convention 138(7)*).

Forced Labour

The Company shall make no use of forced or compulsory labour.

Compensation and Working Hours

The Company shall comply with the respective national laws and regulations regarding working hours, wages and benefits.

Freedom of association

Altomed respects the right of all workers to freely and voluntarily establish and join groups for the promotion and defence of their occupational interests. Workers have the right to set up, join and run their own organizations. Altomed promotes open communication between employees and employer on conditions of work etc.

Discrimination

The Company shall not discriminate on the basis of race, religion, disability, age, sexual orientation, or gender.

Health & Safety

The Company shall strive to implement the standards of occupational health and safety at a high level. The Company complies with applicable occupational health and safety regulations and provides a work environment that is safe and conducive to good health, in order to preserve the health of employees and prevent accidents, injuries and work-related illnesses.

Business Continuity Planning

The Company shall be prepared for any disruptions of 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.

Improper Payments/Bribery

The Company shall comply with international anti-bribery standards as stated in the United Nations' Global Compact and local anti-corruption and bribery laws including The Bribery Act 2010. In particular, the Company may not offer services, gifts, or benefits of employees in order to influence the employee's conduct.

Environment

The Company shall comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.

The Company shall strive to support climate protection goals through the products and services they deliver (e.g., by providing relevant data on climate protection). In this regard, the Company shall also take climate protection appropriately into account in their own operations, for example by setting climate protection goals for themselves and achieving them.

Business Partner Dialogue

The Company shall communicate the principles stated in this Company Code of Conduct to its subcontractors and other business partners who are involved in supplying the products and services described in the main contract. The Company shall motivate such parties to adhere to the same standards.

Compliance with the Company Code of Conduct

Altomed Limited reserves the right, upon reasonable notice, to check compliance with the requirements of the Company Code of Conduct. Altomed encourages its Suppliers to implement their own binding guidelines for ethical behaviour.

The Company shall adhere to the ethical standards, human rights, health and safety standards and environmental standards upon which this agreement is based, as part of fulfilling their contractual obligations.

Any breach of the obligations stipulated in this Company Code of Conduct is considered a material breach of contract by the Company.

Altomed are committed to accomplish the following targets:

Target	Target Date	Responsibility
To review Altomed LSAS Policy, objectives, targets, and performance annually or when required.	September 2022	BG
Maintain Level 2 LSAS System or higher	September 2022	BG
Review LSAS System annually at management review with senior staff members	January 2022	BG, NM, AW
Review updates to the necessary international legislation regarding labour and ethics standards (FL Memo Subscription and periodic NATLEX checks).	6 monthly	BG
Contact suppliers of concern and resolve discrepancies from high-risk countries to ensure legal requirements are being met.	September 2022	BG
Try and gather more information from the suppliers from high-risk countries to ensure legal requirements are being met.	September 2022	BG
Receive updated labour ethics questionnaires from all Tier 1 suppliers.	September 2022	BG
Maintain and update training for all relevant staff members	July 2022	BG, NM, AW, NR
Monitor Sedex memberships, review whether it is commercially viable next year.	September 2022	BG

Whistleblowing

Altomed urges any employees, customers, suppliers, or stakeholders to raise their concerns about malpractice for concerns where the interests of themselves, others, or the organisation are at risk.

Altomed operate a confidential whistleblowing procedure, report any concerns to

whistleblowing@altomed.com.

Signed



Nico Master
Managing Director
Altomed Limited

02/09/2021