

Supplier Code of Conduct

Sectra Limited (UK & Ireland)



SECTRA

Knowledge and passion

1 Introduction

Sectra Limited and Sectra Ireland Limited (together referred to as “**Sectra**” throughout this document) provide enterprise imaging solutions to the NHS and healthcare organisations across the UK and Ireland. We are committed to conducting business ethically, respecting human rights, and upholding high labour and environmental standards throughout our supply chain.

This Supplier Code of Conduct (“**Code**”) sets out the minimum standards we expect of all organisations that supply goods or services to Sectra. It reflects our obligations under the NHS Labour Standards Assurance System (LSAS) and our alignment with internationally recognised frameworks including the ILO Declaration on Fundamental Principles and Rights at Work and the UN Universal Declaration of Human Rights.

Purchase Order Acceptance

By invoicing against a Sectra issued Purchase Order, the supplier confirms acceptance of this Supplier Code of Conduct and agrees to abide by its requirements, together with any obligations set out in any applicable agreement with Sectra.

2 Labour Standards

2.1 Child Labour & Forced Labour

We do not permit exploitation of children or involuntary servitude anywhere in our supply chain. Suppliers must not employ anyone under the age of 16, must not permit workers under 18 to perform hazardous work, and must not use forced, bonded, trafficked or compulsory labour in any form. Debt bondage and unacceptable financial costs forced upon workers are expressly prohibited. Suppliers must take appropriate steps to protect migrant workers and comply with all applicable local laws on minimum age and voluntary employment.

2.2 Non-Discrimination & Prevention of Harassment

Every worker is entitled to dignity and respect. Suppliers must not discriminate on the basis of race, religion, colour, ethnicity, national origin, disability, sexual orientation, gender, gender identity, marital status or any other protected characteristic. Suppliers must provide a workplace free from harassment, bullying, and abuse of any kind whether it is physical, sexual, racial, psychological or verbal.

2.3 Wages & Working Hours

Suppliers must pay workers at least the applicable minimum wage and comply with all wage and hour laws and collective agreements. Normal working hours must not regularly exceed 48 hours per week, or 60 hours including overtime, and workers must receive at least one day of rest in every seven-day period, in line with ILO standards.

2.4 Freedom of Association

Suppliers must respect workers' rights to join or not join a trade union or organisation of their choice, and to bargain collectively. Where freedom of association is restricted by law, suppliers should support alternative means of employee representation. Retaliation against workers exercising these rights is not permitted.

2.5 Health, Safety & Wellbeing

Suppliers must provide safe and healthy working conditions in compliance with all applicable health and safety legislation. This includes proactively identifying and mitigating workplace risks and fostering a culture where worker wellbeing is prioritised.

3. Legal & Regulatory Compliance

Suppliers must comply with all applicable laws and regulations in every jurisdiction in which they operate. This includes, but is not limited to:

- **Modern Slavery Act 2015:** no forced, trafficked, or compulsory labour at any tier of the supply chain
- **UK GDPR & Data Protection Act 2018:** personal data must be handled lawfully, securely, and transparently
- **Bribery Act 2010:** no bribery, corruption, or improper inducements of any kind
- **Equality Act 2010:** no discrimination against employees, workers, or service users
- **Health & Safety at Work Act 1974:** safe working conditions for all
- **NHS Labour Standards Assurance System (LSAS):** suppliers within LSAS scope must meet NHS LSAS requirements and co-operate with any associated audit or verification activity

4. Ethical Business Conduct

Suppliers must conduct business with integrity. This means:

- Not offering, paying, soliciting, or accepting bribes or improper inducements
- Disclosing any actual or potential conflicts of interest promptly
- Maintaining accurate business records and financial reporting
- Complying with applicable export controls, trade sanctions, and competition law
- Not engaging in fraudulent, deceptive, or misleading practices

5. Information Security & Data Protection

Suppliers must comply with all applicable data protection and privacy laws, including UK GDPR, and must implement appropriate technical and organisational measures to protect any data or systems they access including maintaining security practices aligned with recognised industry standards.

Suppliers must only process data in accordance with documented instructions from Sectra and must not use, disclose, or otherwise process such data for their own purposes. Access to data must be restricted to authorised personnel who are subject to appropriate confidentiality obligations.

Suppliers must notify Sectra without undue delay of any data breach or security incident that may affect Sectra or its customers and must take immediate steps to contain and mitigate any such incident. Suppliers must provide reasonable cooperation and assistance to Sectra in investigating, managing, and remediating incidents, and in meeting applicable legal and regulatory obligations.

Suppliers must not engage sub-processors or share data with third parties without appropriate authorisation and safeguards in place, including ensuring that any international transfers of personal data are subject to lawful transfer mechanisms and documented in accordance with the applicable data processing agreement.

Upon termination of the supplier relationship, suppliers must securely return or delete data in accordance with applicable legal and contractual requirements.

6. Environmental Responsibility

Suppliers are expected to take reasonable steps to minimise their environmental impact, including complying with all applicable environmental laws, reducing waste and emissions where practicable, and responsibly managing the disposal of hazardous materials. We encourage suppliers to support broader sustainability goals relevant to NHS supply chains.

7. Social Value

Sectra is committed to creating positive social impact through its work with the NHS and we encourage our suppliers to share this commitment. We invite suppliers to consider how their activities can generate wider benefit for the communities in which they operate whether through local employment, skills and education, volunteering or support for diverse and inclusive workplaces.

8. Supply Chain

Suppliers are expected to cascade the principles of this Code to their own sub-suppliers and business partners. Subcontracting of Sectra work requires prior written consent, and suppliers remain responsible for ensuring subcontractors meet the standards set out within this Code.

9. Reporting Concerns

We are committed to an environment where concerns can be raised freely. Suppliers who become aware of any breach or potential breach of this Code, whether within their own organisation or elsewhere in the supply chain, are encouraged to report it to Sectra via our [Whistle Blowing Reporting Form](#).

10. Review

This Code is reviewed and updated (as required) annually. Sectra reserves the right to take appropriate action, including termination of the supplier relationship, where serious or repeated breaches are identified.

This Code has been reviewed and approved by:



Jane Rendall
Managing Director
Sectra Limited & Sectra Ireland Limited



Paula Sutton
Finance Director & LSAS Manager
Sectra Limited & Sectra Ireland Limited