

BS Surgicare SMC Pvt Limited Modern Slavery, Ethical Labour & Social Value Policy

Publication Date: 02 March 2026

Location: Sialkot, Punjab, Pakistan



1. Commitment Statement

BS Surgicare SMC Pvt Limited is fully committed to the prevention of modern slavery, child labour, forced labour, human trafficking, debt bondage, and all forms of exploitation within our organisation and supply chains. We recognise that Sialkot, Pakistan, presents elevated industry risks relating to labour exploitation. Accordingly, we adopt a zero-tolerance approach aligned with the UK Modern Slavery Act 2015, NHS PPN 009, and the Government Social Value Model (PPN 002). We operate in full compliance with Pakistani labour law and hold a valid Labour Registration Certificate issued by the Government of Punjab. We maintain independent social audit verification through recognised audit bodies and are committed to continuous improvement beyond minimum legal compliance.

2. Purpose and Scope

This policy establishes governance controls, due diligence processes, remediation procedures, risk monitoring, and social value commitments across our full value chain including raw material suppliers, subcontractors, labour providers, logistics partners, and service providers.

3. Regional Risk Context and Mitigation

Recognising sector-specific risks in surgical instrument manufacturing in Sialkot, we apply enhanced due diligence in relation to: child labour, home-based subcontracting, informal labour engagement, migrant worker vulnerability, wage withholding, and excessive overtime. Our mitigation controls include:

Age Verification

Strict minimum age verification (18+ policy) with documented CNIC records.

Subcontracting Control

Prohibition of subcontracting without prior written approval and audit.

Wage Payment

Direct wage payment through traceable banking channels.

Working Hours

Maximum working hours in accordance with Punjab Factories Act 1934.

Document Retention

No retention of identity documents.

Grievance Mechanism

Worker grievance mechanism with anonymous reporting channel.

4. Governance Structure

The Managing Director holds ultimate accountability for labour standards and ethical sourcing compliance. A designated Compliance Officer oversees implementation, audit readiness, training, and corrective actions. **Annual Review:** This policy is reviewed annually and approved at Director level.

5. Due Diligence & Monitoring Framework

Our due diligence system includes:

-  Annual independent social audit (third-party verification).

- Labour Department compliance inspections.
- Supplier onboarding risk assessment.
- Corrective Action Plans with defined timelines (30/90/180 days).
- Documented worker contracts and payroll records.

6. Remediation & Escalation Procedure

If any indicator of modern slavery or child labour is identified, immediate containment action will be taken. Within 10 working days, a formal remedial action plan will be developed. Confirmed severe violations may result in contract suspension or termination of responsible subcontractors.

7. Training & Awareness

All supervisory and HR staff receive annual labour standards training covering ILO indicators, child labour laws, anti-trafficking awareness, and grievance handling procedures.

8. Social Value Commitments – NHS PPN 002 Alignment

Mission 1 – Fair Work & Skills Development

- Provide safe employment for local skilled workforce.
- Offer apprenticeship pathways for young adults (18+).

Mission 2 – Sustainable Procurement

- Improve energy efficiency in manufacturing processes.
- Reduce packaging waste and increase recyclability.

Mission 3 – Reducing Barriers to Opportunity

- Promote female workforce participation in quality control and administration.
- Maintain non-discriminatory hiring policy.

Mission 4 – Health & Wellbeing

- Maintain safe factory environment compliant with Punjab Occupational Safety standards.
- Provide PPE and regular health checks for workers.

9. Certifications & Supporting Documentation

The following documents are maintained and available for tender submission:

- Punjab Government Labour Registration Certificate.
- Independent Social Audit Report (External Organization).
- Worker employment contracts and payroll records.

1. Declaration

This policy is approved by the Board of Directors of BS Surgicare SMC Pvt Limited. We confirm our commitment to ethical manufacturing, full transparency, and alignment with NHS procurement expectations.

Signed

Natasha Khan

Name: Managing Director

Date: 02 March 2026