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Purpose:


The purpose of this procedure is to define the procedures for forwarding reports by interested parties (workers, customers, suppliers, etc.) regarding compliance with the requirements of the reference standard SA8000 by STERIS S.p.A. and their management, including definition of causes, corrective actions and preventive actions.

Scope:

This procedure applies to all the structures and employees of STERIS S.p.A.

Definitions/Acronyms:

SPT	Social Performance Team. The Team includes a balanced representation of SA8000 worker representatives and management.
Reports	Non conformities (NC), complaints (RC) and/or suggestions for improvement (SG) related to standard SA8000 requirements.
Non-conformity (NC)	Issue related to standard requirements, identified before receiving a complaint (claim) from an interested party, for example during internal and external audit activities by control bodies
Complaint (RC)	Issue related to standard requirements, identified by an interested party (e.g. STERIS workers, customers, suppliers)
Suggestions for improvement (SG)	Improvement proposal regarding the requirements of the SA8000 standard
Root cause analysis	Process of analyzing a non-conformity/complaint, aimed at identifying the causes in order to establish an appropriate plan of corrections, corrective actions and preventive actions (CAPA plan).
Correction/ Containment action	Action taken to eliminate a detected non-conformity/complaint.
Corrective action	Action taken to eliminate the cause(s) of a detected nonconformity. Note: Corrective actions are taken in order to prevent recurrence of nonconformity.
Preventive action	An action taken to eliminate the root cause (s) of a potential non conformity Note: Preventive actions are taken to prevent the occurrence of a non-conformity. Such actions may derive, for example, from the Management Review activities
Effectiveness verification	Verification process over time that the implemented corrective and preventive action plan has successfully eliminated the cause of the non-conformity/complaint.

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Reference Documents:

SA8000:2014 - 9.6 Complaint Management and Resolution
GUIDANCE DOCUMENT FOR SOCIAL ACCOUNTABILITY 8000

Exhibit:

None

Forms/Lists/Templates:

SA002-FR-001 Modulo segnalazione SA8000
SA002-FR-001 SA8000 report form
SA002-FR-002 Registro segnalazioni SA8000

Procedure:

1. Sending a report

Any interested party (workers, customers, suppliers, etc.) can send reports in relation to facts and events of the nature of abuse, offense or illegality that occurred in the workplace or related to it, as well as forward suggestions for the improvement of aspects related to social responsibility.


The complaint report can be sent:

- To the SA8000 Workers' Representative, who will forward it to the other members of the Social Performance Team;
- To STERIS S.p.A. Social Performance Team;
- To STERIS Corporate;
- To the SA8000 Certification Body;
- To SAAS

The contacts are given in the Social Responsibility Policy and/or in the organizational charts displayed at the sites.

For the applicable sites, the report can be placed in a special box: this box will be opened once a month by the Workers' Representative to verify the presence of reports and forward them to the SPT.

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For external interested parties (such as Customers and Suppliers), this procedure or its extract and forms SA002-FR-001 for sending reports are made available on the company website.

The report can also be made anonymously: STERIS guarantees in any case the maximum confidentiality on the facts reported or highlighted, within the limits of the freedom of investigation and undertakes to investigate even in the case of anonymous reports.

The reports made by one or more interested parties and addressed to STERIS, concerning issues related to the social responsibility system, are collected by the SPT and kept confidential within the company.

Suggestions for improvement, on the other hand, can be forwarded to the SPT in the same manner as described above.

2. Management of reports and definition of containment and corrective actions

The reports are handled by the Management through its Representative who, supported by the SPT and any other functions by competence, coordinates their resolution and activates the necessary corrective actions.

In detail, the process of managing a report involves the following phases:

- Assessment of the relevance of the report, i.e. whether the report is deemed justified or not.


If the report proves to be relevant, we proceed with:

- Root cause investigation
- Definition of a plan of containment and corrective actions
- Definition of the methods of verification of effectiveness.

In this management process, STERIS favors the direct meeting and the exchange of evaluations with the employee who made the complaint, possibly supported by the SPT, in order to achieve complete knowledge of the facts and in order to give support and concrete contribution to the worker, victim or witness of forms of abuse, offense or phenomena of impropriety or illegality.

It is specified that STERIS does not implement any form of retaliation or discrimination against the author of a complaint.

Finally, STERIS guarantees the completion of every type of effort and concrete action aimed at solving the problem highlighted and preventing the occurrence of similar or similar situations.

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3. Response to the report

STERIS undertakes to inform the author of the report, if possible, about the relevance of the report and, where applicable, about the actions planned and / or undertaken within 2 months of receiving the report.

If the report is anonymous, the information regarding its management will be shared, where applicable, with all the staff of the site/Company.

4. Planning and implementation of preventive actions

As part of the Management Review and definition of the related outputs, the STERIS Management can plan the implementation of improvement actions which, in the context of this procedure, are considered preventive actions.

5. Records


The reports forwarded to STERIS are recorded in a specific form (reference form SA002-FR-001) which gives evidence of the report received and its management process, with relative assessment of relevance, planning of containment/corrective actions, approval of action plan by the involved functions and implementation of these actions.

With regard to preventive actions, their planning is traced and approved through the relevant Management Review report.

All the reports received and the actions (containment, corrective and preventive) planned and undertaken are finally reported as a whole in the register SA002-FR-002.

This register contains overall all the reports that have emerged, including:

- Complaints from interested parties
- Suggestions for improvement
- Findings found during internal audits
- Findings found during external audits by the certifying body
- Reports addressed to Suppliers
- Reports addressed to Customers

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1	First issue	01-04-2021