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Purpose:


The purpose of this procedure is to define the procedures for forwarding reports by interested parties 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.
RLSA8000	SA8000 Workers' Representative
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, company union representatives)
Suggestions for improvement (SG)	Improvement proposal regarding the requirements of the SA8000 standard. This category includes also the recommendations resulting from internal or external audits
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.
CAPA plan	Plan of corrective and preventive actions
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, from suggestions for improvement or from audit activities.

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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

SA006 Gestione azioni correttive e preventive SA8000

Politica della Responsabilità Sociale

SA001-EX-001 Organigramma SA8000

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, company union representatives etc.) can send reports in relation to non-compliance with legal requirements in the workplace and the SA8000 standard, as well as suggestions for improving aspects related to social responsibility.

1.1. Sending a complaint

The complaint report can be sent:

- To the SA8000 Workers' Representative, who will forward it to Human Resources Manager in written way
- To Human Resources Manager in written way
- To STERIS Corporate;
- To the SA8000 Certification Body;

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- To SAAS

The contacts are given in the Social Responsibility Policy and in SPT organizational chart displayed at the sites.

For the applicable sites, the report can be placed in a special box (provided where a RLSA8000 is present). This box will be opened once a month by the Workers' Representative to verify the presence of reports and forward them to the Human Resources Manager.

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

1.2. Sending a suggestion for improvement

Suggestions for improvement, on the other hand, shall be forwarded directly to Human Resources Manager or to SA8000 Workers' Representative in the same way as described above.

1.3. How to send a report

The report can be made in nominal or anonymous form: STERIS guarantees in any case the maximum confidentiality on the facts reported and the protection of the anonymity of the reporters, within the limits of the freedom of investigation, in order to avoid any retaliation.


2. Evaluation of reports and definition of containment, corrective actions and preventive actions

Upon receipt of a report, the Management, through Human Resources Manager and the support of other corporate functions by competence if needed, first of all assesses its relevance.

In the event that the report is justified, we proceed with:

- Implementation of containment, if applicable
- Root cause investigation
- Planning and implementation, if applicable, of corrective and preventive actions as per procedure SA006, to which reference should be made for details.

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.

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It is specified that STERIS does not implement any form of retaliation or discrimination against the author of a complaint: anonymity is guaranteed both in the phase of receiving and in the management phase of the report with the involved parties. Maintaining anonymity is under the direct responsibility of the Human Resources Manager and the SA8000 Worker Representative on the site, properly trained.

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.

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. Records


The reports (complaints or suggestions for improvement) coming from interested parties are recorded on form SA002-FR-001, which gives evidence of the report received and its management process, with relative assessment of relevance, implementation of containment, root cause analysis, planning and implementation of corrective actions/preventive actions, planning and implementation of effectiveness verification step.

This form is shared, once activities to be performed are planned, with the reporter and signed by him as evidence of a reply from STERIS.

All reports arisen with regards to SA8000 are recorded in a specific register SA002-FR-002, where the reports and their management process (if in charge to STERIS S.p.A.) are reported.

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 Certification Body
- Reports addressed to Suppliers


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- Reports addressed to Customers

The Human Resources Manager and the SA8000 Management System Responsible/staff have the task of keeping the above-mentioned documentation updated and keeping it, together with the related evidence, in proper folder, according to the responsibilities specified below:

Report kind \ Responsibility	Responsibility in management	Responsibility in recording and archiving related evidences in proper folder
Complaints from interested parties	Human Resources Manager	Human Resources Manager (SA002-FR-001 e SA002-FR-002)
Suggestions for improvement	Human Resources Manager	Human Resources Manager (SA002-FR-001 e SA002-FR-002)
Findings found during internal audits	SA8000 Management System Responsible/staff	SA8000 Management System Responsible/staff (SA002-FR-002 and SA004 documentation)
Findings found during external audits by the Certification Body	SA8000 Management System Responsible/staff	SA8000 Management System Responsible/staff (SA002-FR-002)
Reports addressed to Suppliers	SA8000 Management System Responsible/staff	SA8000 Management System Responsible/staff (SA002-FR-002 and SA004 documentation)
Reports addressed to Customers	SA8000 Management System Responsible/staff	SA8000 Management System Responsible/staff (SA002-FR-002)

Table 1. Responsibility matrix

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Document Version History:

Version	Change Description	Effective Date
1	First issue	01-04-2021
2	<p>Following the stage I audit by the Certification Body:</p> <ul style="list-style-type: none"> - the figures involved in the presentation of complaints are specified (point 1) - the procedures for protecting the whistleblower are specified (points 1.3 and 2) <p>Reference has been included to a separate procedure SA006 concerning the definition of corrective and preventive actions (point 2).</p> <p>Recording process is reviewed (point 4).</p>	30-06-2021
3	<p>Update of the function responsible for receiving and managing the reports (complaints or suggestions for improvement) received from the interested parties, including maintaining the relevant evidence and updating the register: SA8000 Management Representative replaced by the Human Resources Manager.</p> <p>Update instructions for RLSA8000: upon receipt of a report, it must be forwarded to the Human Resources Manager, according to the usual channels set out in Organization chart SA001-EX-001.</p> <p>Reference to form SA002-FR-001 is added.</p> <p>Table 1 is added to detail the responsibilities in the management and recording of the various types of reports.</p>	01-06-2022