

# GAMA Healthcare Modern Slavery and Human Trafficking Statement 2022/2023



This statement is published in accordance with section 54(1) of the Modern Slavery Act 2015. The Act requires businesses to state the actions they have taken during the financial year to ensure that modern slavery is not taking place in their business and supply chains.

GAMA Healthcare Ltd. is part of the GAMA Corporation Ltd. (UK) group of companies<sup>1</sup>. This statement covers GAMA Corporation Ltd. and its group companies and addresses the steps taken by GAMA to ensure modern slavery is not taking place in our operations and supply chains during the financial year 2022/23 ending 31 March 2023.

## Our organisational structure and our supply chains

GAMA specialises in developing, manufacturing and distributing infection prevention products. Our ethos centres around producing high-quality products to help prevent infections to improve and save lives. GAMA's range of products can be found [here](#).

GAMA has offices in the United Kingdom, Australia and China. Our Science and Innovation centre is located in Halifax, United Kingdom and we partner with/source materials from companies across Europe and from China, India, Hong Kong, Singapore and Israel. We sell our products directly and through distributors on a global basis and the sale of our products internationally has continued to be a significant part of our business throughout 2022/23.

Our modern slavery work continues to be supported and overseen by our Executive Committee, with our Chief Product Officer and Chief Supply Chain Officer fully supportive of the fact that their roles encompass key responsibilities with regards to Modern Slavery.

## Our policies

Modern slavery encompasses slavery, servitude, forced labour and human trafficking. We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain, or any part of our business and we take this responsibility very seriously. We always strive to work to the highest professional standards and comply with all laws, regulations and rules relevant to our business. We expect the same high standards from those businesses with which we work.

As a result of the above, GAMA introduced its first ever Supplier Code of Conduct in 2022/23 which sets out specific standards which GAMA expects its suppliers to comply with. One of the requirements of the Supplier Code of Conduct is for suppliers to GAMA to respect the human rights and dignity of all people and meet the responsibilities of business set out in the UN Guiding Principles on Business and Human Rights including:

(a) ensuring that there is no use of forced or compulsory labour, human trafficking, child labour, slavery, or servitude, and that all work is conducted voluntarily, without threat of penalty or sanction and not based on deception; and

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1. This includes, but is not limited to: GAMA Healthcare Ltd. (UK), Carell Ltd. (UK), and Aga Nanotech Ltd. (UK), Fellows Research Centre Ltd (UK), GAMA Property Corporation Ltd (UK), GAMA Healthcare Ireland Ltd. (ROI), GAMA Healthcare Foshan (China), GAMA Corporation Pty (Aus), GAMA Healthcare Australia (Aus).

(b) identifying, avoiding, minimizing, or mitigating and remedying any human rights impacts on communities.

GAMA continues to utilise its supplier qualification assessments to evaluate compliance with our modern slavery standards. As part of the assessments we review our supply chain's working practices to ensure:

1. their labour conditions are fair, their wages reflect work performance, and all legal requirements are complied with;
2. they do what they can to protect the environment;
3. they operate ethically and responsibly;
4. they strictly prohibit the use of child labour or any form of slavery, involuntary labour and human trafficking as defined in the Modern Slavery Act 2015;
5. they take steps to prevent any form of discrimination; and
6. they comply with all applicable health and safety standards.

## Assessment of modern slavery risk now and moving forwards

We continue to assess our operational practices to determine where our most significant risks are in relation to modern slavery, to assess the severity of any such risks and to determine the extent to which these can be mitigated. We previously identified our two main risks to be in relation to the third parties that we work with; particularly our suppliers and distributors. However, to ensure that we were not overlooking anything in respect of our UK head office, we completed the Sedex Self-Assessment Questionnaire in respect of our offices in Hemel Hempstead in the early part of the 2022/23 financial year, which identified the following three areas as key areas that we could improve upon in order to improve Business Ethics performance:

(a) to implement an ethical procurement policy. This was largely achieved following the introduction of our Supplier Code of Conduct, although compliance with that Code of Conduct still needs to be monitored;

(b) to improve commercial contracts. We started to do this in 2021/22 and continued to do this

throughout 2022/23 as more of our key suppliers and distributors were provided with updated terms; and

(c) to provide staff training on ethical procurement. We rolled out an entirely new training programme on modern slavery for all staff in 2022/23. For more details on this, please see the section on Training below.

In addition to the above, throughout 2022/23, we have continued to monitor, assess and manage our relationships with both our third party suppliers and distributors in order to mitigate the modern slavery risks associated with these interactions, as they continue to be considered high risk and therefore a high priority to us. With respect to our supply chain, we started to adopt the SMETA audit as a means of auditing our key high-risk suppliers (up to and including Tier 2). This is in addition to the sometimes in-person audits and risk assessments that continue to be performed by our quality team.

Going into 2023/24, we are hoping to delve deeper into our supply chain to ensure that suppliers below Tier 2 also meet our ethical standards.

## Due diligence and management of our modern slavery risk

We continue to work with a global Employer of Record ("EoR") company to help address the risks associated with our international and indirect workforce and to ensure compliance with local laws. This partnership continues to enable us to engage with workers across international borders in the absence of having our own local entity in the respective markets. The global EoR carries out the legal and regulatory requirements of immigration, employment, payroll and benefits for our distributed workforce. This collaboration has supported GAMA through global expansion and enabled us to successfully onboard an international and indirect workforce. It is a partnership we continue to value.

To help address the risks associated with our supply chain and distribution networks, we have continued to do the following:

1. communicate our policies to our suppliers and distributors, including via the distribution of our Supplier Code of Conduct;
2. implement supplier and distributor contracts that contain express warranties and indemnities regarding compliance with the Modern Slavery Act 2015 and our policies;
3. identify the risks and level of exposure within our supply chain, so that we are able to manage the risks responsibly; and
4. take a zero-tolerance approach to suppliers who fail to comply with our policies and procedures and with applicable laws.

Our previous Modern Slavery Statement referred to the Modern Slavery Assessment Tool (“MSAT”) made available by the UK government to assess an organisation’s ability to mitigate modern slavery risks. GAMA originally completed the MSAT on 27 July 2021 when it scored green in 5 out of 6 categories. GAMA updated its response to the MSAT on 18 January 2023 and improved its performance from the last assessment by managing to score green across all of the 6 categories and achieving an overall total score of 90%. The report went on to acknowledge that a number of improvements had been made since the previous assessment, which should put GAMA in a stronger position to mitigate modern slavery risks.

## Training

GAMA collaborates with our customers, distributors and employees to seek continuous improvements in our approach to identifying and addressing modern slavery risks.

During 2022/23, GAMA rolled out a specific training programme on modern slavery to all of its UK and international employees (excluding those employed directly by our Australian and Chinese entities) which was completed by over 99% of those invited to take part. The stated learning outcomes of the training programme were as follows:

1. to ensure that GAMA employees understand and work towards compliance with the Modern Slavery Act 2015;
2. to ensure that GAMA employees understand what slavery is and the various forms that the modern slavery umbrella term covers; and
3. to ensure that GAMA employees know how to identify and report suspected modern slavery in and around the workplace to assist GAMA in helping to eradicate modern slavery.

The training programme also made employees aware of GAMA’s whistleblowing policy, which provides a mechanism for our employees to report human rights concerns.

By conducting this training we are helping our employees to develop a higher level of understanding of the risks of modern slavery and human trafficking, with a view to helping them identify and report any areas of concern that they may have in respect of our supply chains or in any other part of our business.

Going forwards, this training will be rolled out to new starters and provided annually as a refresher to those that have already completed it.

## Further steps and monitoring

Going into 2023/24, we will continue to review our policies and processes in an effort to go beyond basic social and environmental regulations and to ensure the highest standards in our supply chain and other third parties with which we work, as expected by our customers.

This statement was reviewed and approved by the GAMA Executive Committee and is supported by both of our Chief Executive Officers.



Dr Guy Braverman  
Joint CEO  
26 September 2023