

GAMA Healthcare Modern Slavery and Human Trafficking Statement 2021/2022



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 companies¹. 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 2021/22 ending 31 March 2022.

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 manufacturers across Europe, and in China, the USA 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 2021/22.

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.

GAMA has a policy on whistleblowing which provides a mechanism for our employees to report human rights concerns.

We aim to ensure that we only work with credible suppliers and contractors so as to limit the potential risk of slavery or human trafficking in our business and supply chains.

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).

To ensure all those in our supply chain comply with our ethos and values, we have in place supplier qualification assessments that set out our expectations of our suppliers and contractors and requires them to:

1. ensure labour conditions are fair, wages reflect work performance, and all legal requirements are complied with;
2. protect the environment;
3. operate ethically and responsibly;
4. 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. prevent any form of discrimination; and
6. 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. At the end of the 2020/21 financial year our risk assessment highlighted our growing international and indirect workforce, as well as our third party suppliers, as the two main risks relating to modern slavery. We have taken significant steps in managing the risks associated with our international and indirect workforce (detailed below) to the extent that our two main risks at the end of the 2021/22 financial year are now as follows:

1. Our main risk regarding modern slavery continues to relate to our suppliers, in particular the risk of suppliers found not to be adopting appropriate employment and human rights practices. As such, this risk continues to hold high priority in all of our risk management processes. We continue to rank, assess and manage our risk in relation to this by focusing on the higher risk countries in our supply chain.

2. Throughout 2021/22, we have also been assessing the risk posed by our distributors and have taken steps to tighten up the onboarding process related to our distributors, and to strengthen our contractual documentation with distributors to ensure that our distributors (similar to our suppliers) adopt appropriate employment and human rights practices.

We believe that our suppliers and distributors should work in accordance with our ethical standards. We understand that if we work in partnership with suppliers or distributors that condone unethical behaviour, our reputation is also at stake. Going into 2022/23, we will continue 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.

Due diligence and management of our modern slavery risk

To help address the risks associated with our international and indirect workforce and to ensure compliance with local laws, we established an ongoing partnership with a global Employer of Record ("**EoR**") company in 2021/22. This partnership enables 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 review and expand going forwards.

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

1. continued to communicate our policies to our suppliers and distributors;

2. started to implement new supplier and distributor contracts that contain express warranties and indemnities regarding compliance with the Modern Slavery Act 2015 and our policies;
3. continued to identify the risks and level of exposure within our supply chain, so that we are able to manage such risks responsibly; and
4. continued to take a zero tolerance approach to suppliers who fail to comply with our policies and procedures and with applicable laws.

Previously, GAMA reviewed its compliance by undertaking an independent audit conducted in accordance with the Labour Standards Assurance System ("LSAS"), which assessed GAMA's competence against the 15 areas related to modern slavery and human trafficking identified by LSAS. However, in line with the requirements of its customers, GAMA has moved away from LSAS in 2021/22 towards the Modern Slavery Assessment Tool ("MSAT") made available by the UK government. GAMA completed its MSAT assessment on 27 July 2021 and scored green across 5 of the 6 categories, with a yellow rating in respect of due diligence where recommendations were made. The recommendations that were made in respect of the due diligence category related to how we handle the recruitment of our indirect workforce (which we have sought to address by our partnership with the global EoR company referred to above), as well as recommendations in respect of working with other third parties which we are continuing to work on going into 2022/23.

Training

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

Although we have moved away from LSAS, our staff continued to be trained on the requirements of LSAS and in respect of our LSAS policies throughout 2021/22. LSAS training continued to form part of the induction training programme rolled out to all individuals when they start to work for us, and annually thereafter. This policy is also communicated to key suppliers, contractors and business partners of GAMA. By conducting training on LSAS 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 become aware of in our supply chains or in any part of our business.

Further steps and monitoring

We 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 and the companies with which we work.

Moving into 2022/23, we will review our training programme to determine whether it is still the most effective way of training our staff given that we have now moved away from LSAS. We will also continue to strengthen our practices in rolling out our policies to our supply chain and distributors to ensure they adhere to our principles and values by introducing, amongst other things, a new Supplier Code of Conduct.

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

Signed



Dr Guy Braverman
Joint CEO
30 September 2022