

GAMA Healthcare Limited

International Distributor
Code of Conduct

International Distributor Code of Conduct

About GAMA

GAMA Healthcare is a dynamic, innovative company at the forefront of infection prevention technology. We specialise in the manufacture and distribution of revolutionary IPC products and the provision of exceptional aftercare support. Our Clinell Universal Wipes are the NHS' most used disinfectant wipe and trusted to help safeguard patients and healthcare workers from the risk of infection.

GAMA Healthcare was founded in 2004 by two doctors, Dr Guy Braverman and Dr Allen Hanouka, to help save and improve lives with clinically proven infection prevention products. Today, our Clinell, Rediroom, Carell and Contiplan product ranges protect people in healthcare, businesses and homes across more than 70 countries.



Clinell Universal is part of a family of product-based solutions that make up our infection prevention and control range, combining cleaning (removal of dirt and organic matter) and disinfection (removal of microorganisms) into one easy step. Peracetic Acid Wipes also apply this 2-in-1 protocol to killing high-risk and hard-to-kill microorganisms.

As well as surface disinfection solutions, we offer a skin disinfection and care range that reduce infection, ensure patient comfort, and promote personal hygiene. These include our Contiplan, Carell Bed Bathing and Chlorhexidine Bathing Range. We have also introduced capital solutions for instant patient isolation and air filtration in the form of Rediroom and Rediair. All our solutions and expertise are grounded with realistic testing, scientific validation and education.

International Distributor Code of Conduct

GAMA is committed to conducting its business in an ethical, legal and socially responsible manner with sustainability at the heart of everything we do. As an ISO 14001:2015 Environmental Management System certified organisation, we have implemented an Environmental Policy that we adhere to in all our activities which outlines our commitment to continue improving our environmental performance and play our part in fighting climate change. As part of this commitment, we pledge to achieve Net Zero by 2045 and are working on reducing greenhouse gas (GHG) emissions related to our own operations, as well as those related to our products, services, and supply chain, in accordance with the Greenhouse Gas Protocol.

We expect our International Distributors to share these commitments and meet the following minimum requirements, outlined in this International Distributors Code of Conduct, in order to do business with us.

The GAMA Code of Conduct (the "Code") underpins our expectations of our International Distributors, including but not limited to contractors, vendors, service providers and contingent labour ("International Distributors"), their employees and International Distributors. These expectations are not replacements or substitutes for the Code itself or applicable laws, nor do they amend contracted obligations. We want our International Distributors to strive for sustainability in their own operations as well as their supply chain, innovation and excellence in their delivery, and a commitment to responsible business practices. We ask that you communicate these expectations to your employees, International Distributors and business partners who may provide goods or services to GAMA. We expect all our International Distributors to adhere to this Code and any future versions as we may make amendments to it.



1. Compliance with laws and regulations and priority of standard

1.1 In carrying out its agreement(s) with GAMA, the International Distributor shall, in addition to complying with the standards set out in this Code, comply with all applicable UK laws and regulations (and if applicable, the laws and regulations of any other jurisdiction where it or its representatives operate) including but not limited to the laws and regulations relating to issues addressed in this Code. This includes all laws and regulations applicable to the goods and services being provided.

Competing standards shall be addressed as follows:

- (a) If there is a conflict between any applicable laws or regulations, the provisions of an agreement with GAMA and the provisions of this Code, the International Distributor shall meet the most stringent standard.
- (b) If there is a conflict between the provisions of an agreement with GAMA and the provisions of this Code, the International Distributor shall meet the more stringent standard.

1.2 Updating this code:

GAMA has the right to modify this Code from time to time on giving the International Distributor at least 30 days' notice in writing (includes email).

2. Health, safety and the environment ("HSE")

We expect our International Distributors to ensure the health and safety of their workplace and of the environment and shall, without limitation:

- (a) **Environment:** Comply with all international, national, and local laws regarding the environment and the use of restricted substances. Obtain, maintain, and keep current all required environmental permits, licences, registrations, and approvals as well as any operational reporting requirements as identified in the applicable laws, regulations, standards, ordinances, rules, codes, standards, guidelines and regulations of the jurisdiction in which the facility is located. Where possible, identify and implement responsible and sustainable practices to reduce the environmental impact of operations, including a focus on reducing carbon emissions.

- (b) **Hazardous and restricted substances:** Comply with all applicable environmental laws and regulations regarding waste, hazardous or toxic materials, and identify and disclose to us all chemicals in products that are regulated by a government or other authority in the applicable jurisdiction where they are being used. Make efforts to decrease the use of hazardous or toxic materials including, where possible, implementation of focused reduction initiatives and use of less hazardous alternatives.
- (c) **Work environment:** Provide a safe, healthy, and sanitary working environment and comply with all applicable health and safety laws, including, where appropriate, addressing occupational injury and illness, emergency preparedness, and occupational safety. This includes but is not limited to implementing general and relevant industry-specific procedures and safeguards to prevent workplace hazards, and work-related accidents and injuries. Where such hazards cannot be adequately prevented or controlled, provide workers with appropriate personal protective equipment to protect against hazards typically encountered in that scope of work.
- (d) **Facility security:** Always maintain adequate security at International Distributor facilities. Additionally, our International Distributors and their representatives must comply with our security procedures when at our facilities.

3. Net Zero

We expect our International Distributors:

- (a) To actively reduce their carbon emissions across the whole lifecycle of goods, works and services and offer low-carbon design alternatives when possible.
- (b) To quantify the embodied carbon in key assets and equipment for GAMA, and where possible, propose low-carbon alternatives.
- (c) To have a net zero carbon reduction strategy and associated commitment or target in place, which is in line with climate science.
- (d) To support GAMA's goal of Net Zero and support in providing the required data for carbon calculation and mitigation.

4. Bribery and corruption, money laundering, conflicts of interests and anti-competitive conduct

- 4.1 The International Distributor shall comply with all applicable laws, statutes and regulations relating to the prevention of bribery and corruption (including but not limited to the Bribery Act 2010). To that end, the International Distributor shall not accept, offer, promise, pay, permit or authorise:
- (a) bribes, facilitation payments, kickbacks or illegal political contributions;
 - (b) money, goods, services, entertainment, employment, contracts or other things of value to obtain or retain improper advantage; or
 - (c) any other unlawful or improper payments or benefits.
- 4.2 We expect our International Distributors to promote transparency and accountability in the conduct and administration of business, including having in place:
- (a) 'Adequate Procedures' to prevent bribery (within the meaning in section 7(2) of the UK Bribery Act), including expressly prohibiting the direct or indirect giving, paying, promising or accepting of anything of value to obtain, retain or direct business, to secure an improper advantage or to influence someone including government officials to improperly perform their duties, and provision of ABC training to your employees and those performing services for or on behalf of your organisation; and
 - (b) Effective processes and procedures to proactively prevent:
 - (i) Money laundering, including the act of hiding illegal funds (especially those with possible links to terrorism or criminal activity) or giving such funds apparent legitimacy.
 - (ii) Actual or apparent conflicts of interest between personal and business interests, including using GAMA information and resources for improper gains.
 - (iii) Anti-competitive conduct, including any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers or restrict supply.
 - (iv) Inappropriate provision of gifts, entertainment, or meals to GAMA personnel, third parties representing GAMA or any other party in the supply chain. When legitimately required in rare cases, they should be of modest value and appropriately-timed; and
 - (v) Any form of criminal fraud, including the offences in Schedule 13 of the Economic Crime and Corporate Transparency Act 2023, and such processes will meet the requirements of "prevention procedures" within the meaning in section 199(4) of the Economic Crime and Corporate Transparency Act 2023.

5. International trade law

Our International Distributors must comply with applicable international trade laws. Classify in advance, with appropriate labelling, documentation, licences and approvals completed, all products intended for import or export, including the transfer or sharing of restricted software, technical data, or technology.

6. Human rights and modern slavery

We expect our International Distributors 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 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.
- (b) Identifying, avoiding, minimizing, or mitigating and remedying any human rights impacts on communities.

7. Protecting confidential information

We expect our International Distributors to have effective protocols in place for securing and protecting GAMA's information including:

- (a) Respecting the proprietary and intellectual property rights of GAMA.
- (b) Having information classification protocols and adopting industry best practices on sharing, protecting, and securing information.
- (c) Observing all data privacy legal requirements on the collection, processing and transfer of GAMA personal data.
- (d) Reporting any suspected or actual information security incidents that impact GAMA information or systems to GAMA as soon as practically possible.

8. Non-discrimination, grievance processes and freedom of association

We expect our International Distributors to provide a workplace which:

- (a) Is free from harassment, including sexual harassment, intimidation, inhumane treatment and discrimination based on race, ethnicity, religion, national origin, disability, age, sexual orientation, gender or marital status ("Unacceptable Conduct");
- (b) Has mechanisms to allow workers to speak up or raise grievances without fear of retaliation; and
- (c) Respects individual choices on trade union or works council membership within the appropriate national legal framework.

We are committed to providing a work environment free from Unacceptable Conduct. Any such Unacceptable Conduct towards our staff by International Distributors, their employees, agents or contractors will not be tolerated. International Distributors must take all reasonable steps to ensure their personnel do not engage in Unacceptable Conduct when interacting with our staff, whether on our or your premises or in connection with any work-related activity.

9. Ethics and compliance

We expect our International Distributors to have a programme in place to promote awareness and embed ethical business practices and compliance with laws in your business.

This programme must include appropriate training and awareness on preventing Unacceptable Conduct and on how concerns regarding unethical business practices, non-compliance with laws or Unacceptable Conduct can be raised safely and without fear of retaliation.

10. General Business

We expect our International Distributors to have:

- (a) Fair competition and practices: Compete for all business opportunities fairly, ethically, legally, and comply with all antitrust and fair competition laws regulating competition and trade in each jurisdiction where they conduct business. Our International Distributors shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of antitrust laws.
- (b) Marketing and sales: Represent their products and services accurately and comply with applicable regulatory and legal requirements governing the marketing and sale of their products and services.

- (c) Fair dealing: Deal fairly with customers, International Distributors, competitors, independent auditors, employees, and any regulatory or government officials and not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing or practice.
 - (d) Responsible sourcing: Exercise due diligence and mitigate potential risks, for any materials and/or International Distributors in their supply chain originating from high-risk regions, including those associated with armed conflict, child labour, forced or involuntary labour, human trafficking, gross human rights violations, severe health and safety risks, substantially negative environmental impacts or other similar, reasonably objective, high-risk activities.
-