

GAMA Healthcare Modern Slavery and Human Trafficking Statement 2024/2025



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 Healthcare Corporation Ltd. (UK) group of companies¹. This statement covers GAMA Healthcare Corporation Ltd. and its group companies ("**GAMA**") 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 2024/25 ending 31 March 2025.

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, China and, since late 2024, Spain. 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.

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.

This year we have utilised and built on the tools adopted in previous years to ensure our suppliers 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. We have continued to:

(a) audit and risk assess our suppliers using the SEDEX Members' Ethical Trade Audit (**SMETA**) measurement criteria (such criteria being based on the Ethical Trading Initiative ETI Base Code, which in turn is based on both international standards and International Labour Organization (ILO) conventions. The human rights standards derived from the UN Guiding Principles on Business and Human Rights are also covered by the SMETA measurement criteria (together "the **Standards**") to ensure they meet the Standards. We have now been carrying out audits on our Tier 1 suppliers using this measurement criteria since 2022/23;

1. This includes, but is not limited to: GAMA Healthcare Ltd. (UK), Carell 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) and GAMA Healthcare Europe SL (Esp).

(b) benefit from our membership to the extended SEDEX platform, which enables us to utilise the sophisticated risk assessment tools available on that platform to help us prioritise actions and better understand the overall risk related to individual suppliers (taking into account individual site characteristics, as well as inherent risks related to geolocation and industry sector);

(c) raise awareness of our requirements by continuing to remind suppliers of the provisions of our Supplier Code of Conduct (which is published on our website at [GAMA Healthcare | Sourcing](#)) and require compliance with the same. In January 2025, this was supplemented by the publication of our Reseller Code of Conduct which made it clear that we expect the resellers of our products within the UK to comply with the same standards as our supply chain; and

(d) require our Tier 1 manufacturers and international distributors to commit to complying with the Standards in the contractual documents that we enter into with them whilst ensuring that the same contracts do not include provisions that may encourage modern slavery (for example, in our contracts with manufacturers, we do not: adopt aggressive pricing models; require short lead times; enforce unfair penalties for not meeting orders; or permit late high-volume orders to be placed).

All of the above, together with our internal employee facing policies included in our Employee Handbook or within our separate labour standard policies, are intended to aid compliance with the SMETA 4-pillar criteria (encompassing labour standards and health and safety, as well as the 2 optional pillars covering the environment and business ethics). In particular, with regard to modern slavery, the above actions and requirements are intended to enable compliance with the Standards by (without limitation):

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

(b) ensuring that individuals have freedom to join a trade union or other organisation of their choice and to bargain collectively in support of their mutual interests;

(c) prohibiting discrimination and harassment of any kind, including (but without limiting) where it is based on factors such as race, religion, colour, ethnicity, national origin, disability, sexual orientation, gender, gender identity, gender expression or marital status;

(d) ensuring compliance with all applicable laws relating to working conditions and terms of employment including laws relating to wages and benefits, hours of work, overtime arrangements, overtime compensation and holiday entitlements; and

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

Assessment of operational modern slavery practices now and moving forwards

We continue to assess our operational practices to determine where our most significant areas of exposure are and to determine the extent to which these can be mitigated.

On 19 July 2024, to assist us with the above, we undertook our fourth assessment utilising the UK government's Modern Slavery Assessment Tool ("MSAT"). Comparing the results to our January 2023 MSAT assessment (which was referenced in our 2022/23 Modern Slavery Statement), we again scored 100% in the risk assessment and management, training and KPI categories and so it was good to know that we had maintained our high standards in those three areas. Unlike last time, we also scored 100% in the governance section of the assessment and so it was useful to have it confirmed that we had made marked improvements in that area. Unfortunately, we dropped 3 percentage points to 86% in the policies and procedures section (but remained "green" in respect of that section overall) and dropped 10 percentage points to 63% in the due diligence section (but remained "yellow" in respect of that section overall). There were four key recommendations for improvement identified by the MSAT which can be summarised as follows:

(a) to extend the scope of our existing policies and ensuring they are effectively communicated to all employees;

- (b) to consider actively working with NGOs and other businesses to support their efforts in preventing and mitigating modern slavery;
- (c) to improve our due diligence specifically with regard to ensuring workers in our organisation and supply chain are not trapped in debt bondage; and
- (d) to improve our processes for responding to a report of suspected instances of modern slavery.

We have already taken steps to implement some of the recommendations suggested by the MSAT, particularly in relation to points (c) and (d) above. Our efforts to improve our due diligence processes are summarised below. In relation to point (d), we are in the process of implementing a critical response process for acting upon modern slavery incidents in our supply chain.

Due diligence and management of our modern slavery risk

To help us manage the modern slavery risks associated with our supply chain (identified as being our highest risk area given that a number of our contract manufacturing suppliers are located in China and India, two of the six G20 nations that were identified as among the countries with the largest number of people in modern slavery in the Global Slavery Index 2023) and distribution networks, we have continued to do the following:

- (a) communicate our policies to our suppliers and distributors;
- (b) implement supplier and distributor contracts that contain express warranties and indemnities regarding compliance with the Modern Slavery Act 2015 and our related policies; and
- (c) identify the risks and level of exposure within our supply chain by using the various due diligence tools available to us.

To improve our due diligence (as per the MSAT recommendation) and to assist us in the successful identification of risk as per point (c) above, we have formally standardised our approach to due diligence by publishing our Supplier Social Accountability Risk Assessment and Due Diligence Standard Operating Procedure ("the **DD SOP**") which defines which due diligence tools should be used when.

The supplier due diligence tools available to us include: use of the SEDEX supplier pre-screening

and risk assessment platform; supplier self-assessment questionnaires; supplier policy and procedure reviews; risk-based in-person audits; and corrective action plans for areas identified as requiring performance improvement. The DD SOP clearly sets out which of these tools should be used when and how often each assessment should be repeated.

All Tier 1 suppliers are assessed against the 11 International Labour Organisation (ILO) indicators for modern slavery prior to being engaged and then again at least once every two years (for low-risk suppliers) but annually for moderate and high-risk suppliers. In the event that GAMA identifies any labour rights issues in any such supplier assessments or other due diligence exercises, GAMA will, where appropriate and practicable, work with the relevant suppliers to implement improvements in their working practices. Where GAMA is not satisfied that the supplier is able to meet our specific requirements, GAMA will either terminate its arrangements with that supplier or not engage with them in the first place.

Training

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

During 2024/25, GAMA rolled out new starter or refresher training (as appropriate) on modern slavery to all of its UK and Australian employees, as well as providing new starter training to all of its new starters in Spain. As before, the stated learning outcomes of the training programme were as follows:

- (a) to ensure that GAMA employees understand and work towards compliance with the Modern Slavery Act 2015;
- (b) to ensure that GAMA employees understand what slavery is and the various forms that the modern slavery umbrella term covers; and
- (c) 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.

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 into 2025/26 we are aware that we still need to work on the training being offered to the individuals employed by our Chinese entity, as well as the more detailed training to be offered to employees working within our procurement team, as they have the most exposure to our highest risk suppliers. We also need to improve our way of monitoring the modern slavery training key performance indicator.

Further steps and monitoring

Going into 2025/26, we want to continue to work on identifying further key performance indicators that we can monitor related to our business ethical practices.

This statement was signed by a Chief Executive Officer on behalf of the Executive Committee.



Dr Guy Braverman
Joint CEO
3rd October 2025