

# GAMA Healthcare Modern Slavery and Human Trafficking Statement 2023/2024



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 companies<sup>1</sup>. 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 2023/24 ending 31 March 2024.

## 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.

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.

Following the introduction of our Supplier Code of Conduct in 2022/23 ("the Code"), GAMA has been embedding compliance with the Code into our normal business arrangements. This has included GAMA making its suppliers aware of its requirements under the Code by:

- (a) publishing the Code on our website;
- (b) reminding our suppliers of the requirements of the Code in all key correspondence by including a link to the Code at the bottom of relevant email correspondence;
- (c) embedding the Code into our contractual requirements with our suppliers; and
- (d) assessing our key suppliers' compliance with the Code in the supplier social accountability assessments and, where appropriate, site audits.

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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).

In addition, GAMA updated its UK Employee Handbook in 2023/24 ("the **Handbook**") so that it now includes all relevant policies that support ethical recruitment and employment practices as set out in 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**"). This update to the UK Employee Handbook was noted in an internal audit on GAMA's Corporate Social Responsibilities undertaken in January 2024 ("the **Audit**") as a "significant improvement" to GAMA's practices. Both the Code and the Handbook (which sit alongside GAMA's pre-existing Labour Standards Policy) ("the **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 Policies 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.

As part of our update to the Handbook, we also updated our Whistleblowing Policy to set out the process for reporting any suspected instances of modern slavery, as well as setting out the process for how any such reports will be dealt with.

## 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.

In 2023/24, as previously, our highest risk continues to be the fact 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. It is because of this risk (together with the fact that the activities being carried out in those countries often require low skilled or unskilled work) that we extended our relationship with SEDEX by obtaining membership to the SEDEX platform in February 2024. This membership, in addition to the SMETA audit which we started to adopt in respect of our key Tier 1 suppliers in 2022/23, 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). We also have taken active steps to ensure that we do not include provisions in our contracts with suppliers that may encourage modern slavery (for example, 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).

The Audit identified a number of opportunities for improvement which we will continue to work on throughout 2024/25. The most significant of these related to implementing a management system approach to managing human rights issues.

## Due diligence and management of our modern slavery risk

To help manage modern slavery risks related to our use of an indirect workforce, we continue to work with a global Employer of Record ("EoR") company 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 us manage the modern slavery 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 the Code;
2. implement supplier and distributor contracts that contain express warranties and indemnities regarding compliance with the Modern Slavery Act 2015 and the Code; and
3. identify the risks and level of exposure within our supply chain, so that we are able to manage the risks responsibly and assess them appropriately (for example, by means of an in-person audit in respect of our highest risk areas).

In the event that GAMA identifies any labour rights issues in any supplier assessments, 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 2023/24, GAMA rolled out refresher training on modern slavery to all of its UK and international employees, as well as providing new training to new starters and those individuals employed directly by our Australian entity (training to individuals employed by our Chinese entity is to follow). 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.

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. In 2023/24, we also introduced a key performance indicator specifically linked to the modern slavery training which we will monitor going forwards.

Recommendations from the Audit will be incorporated into our 2024/25 employee training programme, including the recommendation that more detailed training be provided for employees working within our procurement team as they have the most exposure to our highest risk suppliers.

### Further steps and monitoring

Going into 2024/25, we want to identify further key performance indicators that we can monitor related to our business ethical practices.

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  
27 September 2024