

GAMA Healthcare Modern Slavery and Human Trafficking Statement 2019/2020



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 2019/2020 ending 31 March 2020.

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 mainly in Southern China, and the United Kingdom.

Our Modern Slavery work continues to be supported and overseen by our Leadership Team, with our Operations and HR Directors fully supportive of the fact that their roles encompass key responsibilities with regards to Modern Slavery. Our Modern Slavery Policy was reviewed and signed by both our Managing Directors.

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.

Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

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. 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; and
5. prevent any form of discrimination
6. comply with all applicable health and safety standards.

Assessment of modern slavery risk

In 2019 we focussed on undertaking a baseline supply chain risk assessment to determine where our most significant risks lie, to assess the severity of any such risks and to determine the extent to which these can be mitigated. This was undertaken by engaging a third party with experience in corporate compliance. Through this work our aim is to ensure that standards are continuously improving and have a clear Corrective Action Plan, which includes measures taken to ensure our practices and those of our suppliers align with good international practice.

As we operate in a highly regulated industry, where we have established policies and processes, and many of our employees are educated or skilled or undertaking work in controlled environments, we believe that the risk of modern slavery in our directly employed workforce is low.

Our main risk regarding modern slavery relates to our suppliers, in particular the risk of suppliers found not to be adopting appropriate employment and human rights practices. As such, this risk holds high priority in all of our risk management processes.

We rank, assess and manage our risk in relation to this by focusing on the higher risk countries in our supply chain.

Due diligence and management of our modern slavery risk

Our focus on modern slavery and human trafficking is part of a larger effort towards supply chain transparency and accountability. We take multiple actions to verify, identify and address the risk that our suppliers are complicit in the practices of forced or compulsory labour, slavery, servitude and human trafficking.

We believe that our suppliers and any other third parties should work in accordance with our ethical standards. We understand that if we work in partnership with suppliers or third parties that condone unethical behaviour, our reputation is also at stake.

To be able to achieve this commitment we have undertaken the following steps:

1. communicating our Policies to our suppliers;
2. aiming for our new supplier contracts to contain express warranties and indemnities regarding compliance with the Modern Slavery Act 2015 and our Policies;
3. identifying relevant members of staff who would benefit from anti-modern slavery and anti-human trafficking training and guidance, so that training and guidance may be provided;
4. identifying the risks and level of exposure within our supply chain, and managing such risks responsibly; and
5. taking a zero tolerance approach to suppliers who fail to comply with our policies and procedures and with applicable laws

As part of GAMA's efforts to increase transparency and reduce the risk of modern slavery in its supply chain, in 2019 we have been working towards achieving compliance for Labour Standards Assurance System ("LSAS"). The LSAS is a UK approach to handling a range of labour standards issues, in response to the ethical procurement needs of the NHS Supply Chain.

Following an independent external audit in July 2019 of our [policies and procedures](#), we are pleased to have obtained our LSAS (Level 2) accreditation.

As part of our LSAS accreditation programme we have

1. produced and implemented an LSAS Policy, which sets out our commitment to transparency in our supply chains in relation to labour standards and modern slavery, and the procedures we will follow to achieve this;
2. conducted a risk assessment of all of GAMA's Tier 1 suppliers, with emphasis on the risk of labour standards and modern slavery abuses;
3. trained staff on labour standards and the steps GAMA is taking to ensure ethical labour policies are maintained in our business and supply chain;
4. communicated our LSAS policy along with specific action plans to our Tier 1 suppliers to ensure ethical labour standards are maintained, and robust procedures are in place to identify and deal with modern slavery; and
5. ensured we have in place effective procedures to deal with critical labour standards issues we are made aware of, either in our own business or our supply chain.

Training

GAMA healthcare collaborates with our customers, distributors and employees to seek continuous improvements in our approach to identifying and addressing modern slavery risks. All our new starters as part of their induction programme undergo Modern Slavery training. In 2019 our Operations Director led a company wide Training session on the significance of modern slavery in the healthcare sector. The training session provided an overview of modern slavery, areas of heightened risk, and our work on embedding the LSAS programme within our organisation and our suppliers.

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, as expected by our customers and the companies with which we work.

This statement was approved by the GAMA Healthcare Leadership Team.

Signed



Guy Braverman
Managing Director
23/09/2020