

Name: LABOUR STANDARDS POLICY		No: POL 02
Issue No: 1	Status: APPROVED	Approval Date: 26-JUL-2019

1. INTRODUCTION

This document sets out the Labour Standards Policy (the "**Policy**") for GAMA Healthcare Ltd ("**GAMA**"). The Policy has been approved by GAMA's Leadership Team (consisting of GAMA's joint Managing Directors and their direct reports). This team has overall responsibility for the implementation of this Policy.

The primary purpose of the Policy is to outline our obligations towards our customers, employees and the communities in which we operate and that may be impacted by our operations. This Policy compliments our employment policies and procedures more generally, including our Anti-Slavery Policy, Anti-Bribery Policy, Whistleblowing Policy and Health & Safety Policy, copies of which are available on our internal HR System.

2. POLICY STATEMENT

The Policy reflects our commitment to upholding ethical labour standards in our business and to implementing and enforcing effective systems and controls to ensure that these standards are upheld within our supply chains.

GAMA is committed to ensuring that there is transparency in our business and approach to tackling ethical procurement issues such as modern slavery, human trafficking, labour standards and worker welfare throughout our supply chains. GAMA expects the same standards from its contractors, suppliers and other business partners.

GAMA is committed to ensuring compliance with national law and regulations and implementing and maintaining an effective Labour Standards Assurance System ("**LSAS**") in accordance with the requirements of NHS Supply Chain. GAMA expects its suppliers to have similar policies in place and to comply with laws and regulations in the territories in which they operate.

This Policy applies to all persons working for GAMA or on our behalf in any capacity, including employees, directors, officers, agency workers, seconded workers, apprentices, volunteers, interns, agents, contractors, sub-contractors, supplier's external consultants and any third parties.

This Policy does not form part of any employee's contract of employment and may be amended at any time.

3. ABOUT US

GAMA is a dynamic, innovative company at the forefront of infection technology, specialising in the manufacture and distribution of revolutionary infection prevention control products and the provision of exceptional aftercare support.

Our supply chains consist mainly of products sourced from suppliers located in the UK and southern China. GAMA produces a range of dry and wet wipes for healthcare environments, along with plastic devices for dispensing products. GAMA has more recently developed capital equipment supporting patient isolation and room sterilisation. New products are typically initiated at GAMA's own research and development centre at Halifax, UK.

GAMA has undertaken a baseline supply chain risk assessment to determine where its most significant risks lie, to assess the severity of any such risks and to determine the extent to which these can be mitigated. GAMA has committed to a Corrective Action Plan which includes measures taken to ensure its suppliers' practices align with good international practice.

GAMA is an ISO 9001 and ISO 13485 (Medical Devices – Quality Management Systems) certified company. Part of our commitment to quality and our ISO 13485 standards is to continually assess and monitor our own performance and process controls as well as those of our suppliers. Our aim is to ensure that standards are continuously improving.

4. MINIMUM LABOUR STANDARDS

GAMA is committed to upholding an ethical labour policy in line with its legal and moral obligations. The standards are maintained within the business and the suppliers within our supply chain.

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These ethical standards cover:

- **CHILD LABOUR:** GAMA does not permit exploitation of children for its employees, or within its suppliers or business partners and respects all relevant local laws and regulations regarding minimum age for employment;
- **FORCED OR COMPULSORY LABOUR:** GAMA does not permit or condone any form of modern slavery whether forced, compulsory or trafficked labour for its employees, or within its suppliers or business partners. GAMA respects all relevant local laws regarding voluntary employment and encourages employees to raise concerns about any issue or suspicion of modern slavery;
- **FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING:** GAMA respects its employees' choice to join a trade union or other organisation of their choice and to bargain collectively in support of their mutual interests;
- **NON-DISCRIMINATION AND HARASSMENT:** GAMA prohibits discrimination and harassment against any employee or applicant, whether such discrimination or harassment is based on factors such as race, religion, colour, ethnicity, national origin, disability, sexual orientation, gender, gender identity, gender expression or marital status and expects its suppliers and business partners to do the same;
- **HEALTH AND SAFETY:** GAMA is committed to ensuring the health and safety of its employees and anyone affected by its activities. GAMA will provide a safe workplace environment and will follow all relevant safety policies and procedures, national and local laws and regulations;
- **WORKING CONDITIONS AND TERMS OF EMPLOYMENT:** GAMA complies 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 requires its suppliers and business partners to do the same.

5. LABOUR STANDARDS STATUS REVIEW

GAMA commits to undertaking a comprehensive review of labour standards (the "**Labour Standards Status Review**") both when contracting a new supplier and at regular routine visits to suppliers to ensure that labour standards throughout our supply chain are satisfactory and continually improving.

GAMA recognises that if any contractor or sub-contractor were found to be using unethical or illegal labour programs, this would have a profound impact on the reputation and integrity of our business.

6. LEGAL & OTHER REQUIREMENTS

GAMA commits to remaining up to date with changes to relevant employment legislation and seeks to comply with the principles of international, national and local law practice.

GAMA complies with applicable legislative and voluntary codes relating to employment, human rights, ethical procurement and equality and discrimination. In particular, GAMA complies with UK employment and health and safety legislation and requirements including but not limited to:

- Health & Safety at Work Act 1974;
- The Management of Health and Safety at Work Regulations 1999;
- Employment Rights Act 1996;
- Bribery Act 2010;
- Equality Act 2010 (as amended);
- Modern Slavery Act 2015;
- Public Interest & Disclosure Act 1998;
- Labour Standards Assurance System;
- NHS Supply Chain – Supplier Code of Conduct.

GAMA adopts the following procedure to identify information on relevant employment and human rights legislation and

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other requirements as they apply to its direct operations, contractors, sub-contractors, suppliers and parties in the supply chain:

- The Management Representative has responsibility for periodically reviewing legislative requirements and ensuring ongoing compliance;
- As part of this review, upcoming changes in legislation are identified and policies and practice updated accordingly;
- The Management Representative is supported by the HR Team to ensure that its policies and practices remain up to date, supported by external counsel.

These requirements are communicated via our policies and training.

7. OBJECTIVES, TARGETS & PROGRAMS

As part of GAMA's commitment to upholding ethical labour standards within its business and supply chain, GAMA has established the following plan of action:

- **LABOUR STANDARDS POLICY:** This Policy has been approved by GAMA's Leadership Team and will be made available:
 - To employees, directors, officers, agency workers, seconded workers, apprentices, volunteers and interns via GAMA's internal HR system and as part of their induction process.
 - To agents, contractors, sub-contractors, suppliers' external consultants and any third parties on commencement of any such engagement
 - Via our website.
- **THE LABOUR STANDARDS STATUS REVIEW:** GAMA shall continue to review and update, and implement its Labour Standards Status Review which includes:
 - Risk assessing GAMA and its suppliers on an ongoing basis to identify risks to labour standards compliance;
 - Vetting suppliers and sub-contractors to ensure that they are committed to ethical labour practices;
 - Measures regarding the inclusion of Anti-Slavery and human trafficking provisions in all our contracts with suppliers; and
 - Only employing agency workers through reputable employment agencies that adhere to our Anti-Slavery Policy (or equivalent policies).
- **LEGAL & OTHER REQUIREMENTS:** The purpose of this Labour Standards Status Review is to:
 - Establish a way of identifying the legal requirements in areas of our supply chain which are known to be of elevated risk;
 - To monitor the risk of slavery, human trafficking and deficiencies in labour standard compliance in our supply chain; and
 - Establish a way of maintaining compliance with relevant employment legislation and local laws.
- **OPERATIONAL CONTROL:** GAMA undertakes checks on its supply chain by carrying out a risk assessment on site visit to suppliers, and where appropriate, providing support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains. GAMA is committed to undertaking these checks on a routine basis.
- **PERFORMANCE MONITORING AND MEASUREMENT:** GAMA is in the process of developing a system that allows it to regularly monitor its compliance with objectives and targets under the Labour Standards Status Review system and relevant legislation.
- **CORRECTIVE ACTION PLAN:** GAMA is committed to developing a Corrective Action Plan as part of the Labour Standards Status Review. The Corrective Action Plan will be reviewed by appropriate senior management to determine whether GAMA is on target to reach its objectives and to ensure these objectives are still appropriate.

8. ROLES & RESPONSIBILITIES

The Management Representative appointed to manage this Policy and the LSAS is The Operations Director. The Operations Director has primary responsibility for overseeing the implementation of this Policy, monitoring its use and effectiveness, and overseeing the auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

The Operations Director will be supported by the Operations Team, the Human Resources Director, and the Human Resources Team. This Policy has been agreed by our Leadership Team and Co-Managing Directors. The Operations Director has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Operations Director will liaise with the Human Resources Director to develop the LSAS and present any developments at regular intervals to the Leadership Team, at least once every quarter following the implementation of this Policy.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

9. COMPETENCE, TRAINING AND AWARENESS OF THIS POLICY

All persons working for GAMA or on behalf of GAMA must ensure that they have read, understand and complied with this Policy. Any suspected breach of this Policy must be reported to a GAMA Director as soon as possible.

GAMA encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. GAMA is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith. If any person believes that they have suffered any such treatment, they should inform their line manager, or alternatively the Human Resources Team immediately.

GAMA provides training for its employees regarding labour standards and this Policy, which includes:

- training as part of their induction process;
- awareness and updates provided at the company's periodic employee updates;
- LSAS awareness provided to those employees who have regular contact with suppliers;
- additional training as appropriate.

This training is reviewed on a periodic basis as part of our management review process.

10. COMMUNICATION

GAMA's commitment to upholding ethical labour standards and addressing the issue of modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

This Policy is available to employees, directors, officers, agency workers, seconded workers, apprentices, volunteers and interns via GAMA's internal HR systems. A copy of this Policy is also made available to agents, contractors, sub-contractors, suppliers external consultants and any third parties on commencement of any such engagement and also via our website. The Policy has also been provided directly to all of GAMA's most critical suppliers.

In addition, GAMA has a whistleblowing policy which applies to its own employees, as well as an Emergency Response / Corrective Action policy which provides a procedure for both its own staff and external interested parties to raise LSAS concerns with it, sets out how those concerns will be raised with senior management and what actions senior management may take in response.

11. DOCUMENTATION AND RECORDS

GAMA retains documentation and records in relation to the LSAS in accordance with our certified Quality Management Systems and relevant data protection legislation.

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12. OPERATIONAL CONTROL

GAMA operates procedures to control labour standards and to address risks and breaches of this Policy and, accordingly, has identified critical control points (being specific points or stages or processes that may have fundamental impacts on labour standards), and documented operations controls for its critical control points.

Areas of risk highlighted will be escalated to GAMA's Leadership Team for consideration and mitigation of identified risks.

13. SUPPLY CHAIN MANAGEMENT

GAMA is committed to monitoring and maintaining the labour standards in its supply chain through the distribution and communication of its labour standards policies along with the ongoing assessment of whether these standards are being met.

New suppliers must meet GAMA's initial approval that outlines the standards to which the supplier is expected to maintain as part of their contract. These standards comply fully with those required by the LSAS. Reviews shall be taken at routine visits to suppliers to ensure they continue to comply fully with the LSAS. GAMA measures the effectiveness of steps taken to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

GAMA will review the effectiveness of this process on an ongoing basis to ensure that there is no slavery or human trafficking in our supply chains.

14. EMERGENCY & CRITICAL ISSUE RESPONSE

GAMA will address issues that justify emergency or critical response in accordance with its Emergency and Critical Issue Response process.

15. PERFORMANCE MONITORING & MEASUREMENT

GAMA commits to monitoring the performance of the LSAS against the Corrective Action Plan where appropriate and setting relevant targets, in addition to those stipulated in this Policy, to ensure the progression of the LSAS against our objectives.

16. REPORTING A BREACH OF THIS POLICY & CORRECTIVE ACTION

GAMA is committed to working directly with its suppliers and customers to tackle human rights issues where made aware of them. GAMA has policies and procedures in place to identify, prevent and mitigate such risks and to remedy any adverse impact on our operations.

Any breaches of this Policy should be reported promptly to a GAMA Director.

17. MANAGEMENT REVIEW

The Policy will be reviewed by the Leadership Team on a periodic basis and at least annually and shall be subjected to external professional review at least biannually.

Appropriate data and performance indicators will be identified and define to monitor and measure performance against the stated objectives and targets of this scheme and the monitor compliance with relevant legislation and other relevant requirements.