

Statement on Modern Slavery

Company commitment

The GBUK Group Ltd and its subsidiary companies (GBUK Enteral Ltd and GBUK Ltd) are committed to ensuring our approach to tackling modern slavery in our own business and throughout our supply chains is consistent with our disclosure obligations under the Modern Slavery Act 2015.

We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

This statement sets out GBUK Group's actions to understand all potential modern slavery risks related to the business and to ensure steps are maintained to prevent both slavery and human trafficking.

The implementation and operation of this management system underlines our commitment to this statement. Formal procedures have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing relevance to the company activities. In the main we follow the LSAS and ETI guidance and are periodically audited to these standards.

The Company aims to achieve these initiatives to identify and mitigate risk in the following ways.

- Stringent vetting and investigation of our supply chain.
- Checking all employees are paid at least the minimum wage and have the right to work.
- We encourage the reporting of concerns and the protection of whistle blowers.
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- Zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors comply with our values.

Organisational structure

GBUK Group is made up of: GBUK Healthcare, GBUK Enteral, GBUK Banana and all are covered by this policy.

Responsibilities and training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have and Senior managers been briefed on the subject.

Policies & procedures

GBUK is committed to conducting business in a responsible and ethical manner. We have a zero-tolerance approach to modern slavery and expect the same high standards and commitment from those we do business with.

GBUK's internal policies and procedures aim to ensure that effective systems and controls are in place to prevent slavery and human trafficking from occurring in any part of our business.

GBUK's code of conduct and business ethics promotes a culture of integrity by establishing principles for how we deal with our customers, employees, and suppliers. We aim to encourage a safe, healthy, and productive workplace and to maintain accountability at all levels of the organisation. Employees are encouraged to report any concerns they may have, including in relation to the occurrence of slavery or human trafficking, either to management or through anonymous reporting.

Supplier due diligence

Suppliers forming a key part of GBUK's supply chain, for example, those who assist us in our provision of services to customers, undergo a standardised vetting process, with the use of template agreements and a standard questionnaire to gather relevant information.

GBUK also runs due diligence reports on all Key suppliers as part of the vetting process. All suppliers must be vetted and approved before they can be used. The vetting process is designed as a risk mitigation measure to provide the best service for our customers and to protect and enhance the GBUK brand.

GBUK monitors and updates the UK supplier documentation to specifically refer to the Act, the LSAS and ETI schemes and now requires each supplier to certify that they comply with these principles.

Training

GBUK maintains an electronic record and training regime for all the employees, and this is regularly monitored by our HR department to ensure compliance with our standards. Our existing suppliers are aware of the standards and are periodically audited to these standards. Any new supplier must be vetted before GBUK will accept a product or service.

This statement relates to the 2021 to 2022 financial year and was approved by:

Mike Geering
GBUK Group CEO

