

GBUK Ethical Trading Policy

Policy Statement

GBUK recognises the shared responsibility it holds with its suppliers to operate in an ethical and socially responsible manner. Promoting decent working conditions within our supply chains is integral to our strategy, ensuring that we act with integrity while fostering the wellbeing of workers and communities. In pursuit of these objectives, we require all our suppliers to adhere to our Ethical Trading Policy.

We expect that all suppliers within our supply chain involved in the production, distribution and sales of our products implement and maintain ethical processes and policies throughout their supply chains. To ensure compliance, we will regularly monitor suppliers through a variety of means, including questionnaires, on site internal audits, and additional tools aimed at risk management, continuous improvement, and capacity building. Suppliers are required to provide reasonable evidence demonstrating their adherence to our Ethical Trading Policy.

Responsibility

The Directors of GBUK hold the responsibility for ensuring that this policy is effectively implemented and adhered to.

The CEO has overall responsibility for oversight of this policy, ensuring that it is enforced across all relevant operational areas.

GBUK and our supply chain are committed to ensuring that

- **Fair Compensation:** Workers within our supply chain are paid fair wages that comply with local labour laws and international standards, ensuring a living wage that fully supports their needs and rights. All workers will be provided with written and understandable information about their employment conditions, before they enter employment. This information will include details about the terms of employment, compensation, working hours, and any other relevant conditions to ensure transparency from the start of their employment. Deductions from wages as a disciplinary measure shall not be permitted
- **Working hours are not excessive:** Working hours must comply with national laws and collective agreements providing the greatest protection for workers. Overtime shall be used responsibly, considering the following, the extent, the frequency and the hours worked by the individual. All overtime must be voluntary.
- **Prohibition of Child and Forced Labour:** We strictly prohibit child labour, forced labour, and any form of exploitation. All workers are employed voluntarily and are of the legal working age as defined by local laws and international guidelines
- **Safe Working Conditions:** We guarantee that all workers within our supply chain work in safe and healthy conditions. All necessary protective measures will be in place to prevent accidents and exposure to harmful substances, ensuring the well-being of every worker. All workers shall receive regular and recorded health and safety training to ensure they are informed about workplace hazards and know how to protect themselves.

- **Dignity and Respect:** Every worker is treated with dignity and respect, fostering an environment free from harassment, abuse, or any form of mistreatment. Intimidation in any form whether direct or indirect is considered harmful and unacceptable. Workers should never feel threatened, coerced or in fear or retribution for voicing concerns or for any other reasons. Threatening discipline as a form of control or intimidation is also prohibited. Workers should never be threatened with disciplinary actions to control behaviour or decision-making. Such threats can lead to fear, stress, and exploitation, which undermines a healthy work environment.
- **Non-Discrimination:** We promote equal opportunities for all workers, ensuring that there is no discrimination in hiring, compensation, or treatment based on race, gender, religion, sexual orientation, disability, or other protected characteristics. Diversity and inclusivity are prioritised to ensure fair treatment of all employees.
- **Freedom of Association:** We support the right of workers to form and join trade unions or any other associations of their choosing. Workers are encouraged to engage in collective bargaining and voice concerns in an open, safe, and constructive environment.
- **Accommodation Standards:** Where accommodation is provided, it must be clean, safe, and meet the basic needs of workers. Accommodation should provide adequate living space, safety, and comfort, ensuring that workers are not subject to overcrowded or unsafe conditions.

This statement was approved by:

Signed by Mike Geering

 *Mike Geering* | I approve this document
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Mike Geering
GBUK Group CEO

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