

As manufacturer of Healthcare Products, GBUK Group recognises its obligation to provide our customers with high quality goods and professional services at a competitive price. Ensuring that at no point, is any person who forms part of the supply chain exploited or treated in a way that breaks employment legislation. GBUK are fully aware of the responsibilities we bear to all parties involved in producing and distributing our products. This policy has been developed to outline the standards that all Stakeholders involved within the business seek to adhere to.

The aim of this policy is to promote understanding and awareness of employment laws and ethical standards. By detailing the expected Labour Standards to all parties in our supply chain, and mandating their adherence to them, we hope to develop better ethical standards. Our objectives are as follows:

- To comply with Employment Laws relevant to our business.
- To become a progressive ethical company compliant with the ETI Base Code, demonstrating compliance with the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights to Work in accordance with the international, national, and local law.
- To comply with the Health and Safety Act 1974.
- For all **Critical** Suppliers to be fully compliant with the with the Ethical Trading Initiative (ETI) Base Code.
- For all suppliers to be complaint with at least 70% of the ETI Base code, this must include an Emergency Response Plan.
- Encourage, help, and support all parties within our supply chain to develop their own Labour Standards Policy.

Labour Standards Representatives

The representatives responsible for implementing an effective Labour Standards Assurance System (LSAS) are David Pickles (Operations Manager) and Melonie Clark (Quality Manager). The responsibilities of the representatives are as follows:

- To develop procedures to meet policy requirements.
- To communicate Labour Standard issues to Senior Management.
- To liaise with companies in the supply chain to undertake the Labour Standard Reviews.
- To liaise with companies in the supply chain to implement a plan of action to meet objectives.
- To regularly review and update the Labour Standards Policy
- To implement training of staff involved with LSAS.

Given the size of the company and the number of companies in the supply chain it is reasonable for the Operations Manager and the Quality Manager to undertake the main Responsibility of the LSAS. The Labour Standards representatives shall report and present any new information and updates to Senior Management at the Management Review Meetings that are held every 6 months.

Labour Standards Status Review

GBUK commit to undertaking a comprehensive Labour Standards Status Review. When contacting a new supplier and at regular routine visits to suppliers. GBUK will ensure that Labour Standards throughout the supply chain are satisfactory and continually improving. We acknowledge that if any contractor or sub-contractor is found to be using unethical or illegal programs, this would have a profound impact on the reputation and integrity of the company. The procedure for conducting a Labour Standards Review, can be found in SOP 03.

Legal Requirements

GBUK commit to remaining up to date with the changes to relevant employment legislation. Relevant employment legislation with regards to GBUK direct operations is outlined in the employee handbook and is signed by all employees once read and understood.

Objectives and Targets

GBUK commit to developing their objectives and targets. As part of the review process and ongoing continuous improvement, the objectives and targets will be reviewed at Management Review to ensure relevance and compliance with LSAS

Competence and Training Awareness

GBUK commit to the training of relevant staff to ensure competence with the handling of GBUK Labour Standards Programme. Training of the LSAS Programme is specific to those directly involved in the programme.

Communications

The Labour Standards Programme is embedded into the Supplier Performance element of the Quality Management System. The LSAS Reviews and Audits of the suppliers enable us to address, log and monitor any adverse incidents, alerts, or allegations as part of this process. Labour Standards is also a key agenda point at Management Review.

Documentation and Records

Any documentation and records relating to LSAS are always kept secure, and in line with Quality document and record keeping procedures.

Operational Control

The Employee Handbook outlines the procedures for external communications and what to do in the event of a breach of this policy. The handbook also outlines the reporting processes. Senior Management of GBUK have identified ~~two~~ three critical control points for Labour Standards within the supply chain. These three critical areas are, Supplier Approval, Supplier Audits and Supplier Performance Review.

Supply Chain Management

GBUK commit to monitoring and maintaining the labour standards within the company's supply chain. This is done through the distribution and communication of the companies Labour Standards Policy, with ongoing Assessments and Audits to ensure these standards are being met. New suppliers must meet GBUK's initial approval, which outlines the standards and expectations that the supplier is expected to meet and maintain as part of their contract. Those standards and expectations fully comply with those required by LSAS.

Emergency Response

GBUK has identified aspects of the ETI Code that are particular importance for meeting the minimum levels of labour standards criteria. These are:

- 1.1 - There is no forced, bonded, or involuntary prison labour.
- 1.2 - Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.
- 4.1 - There shall be no new recruitment of child labour.
- 9.1 - Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

These are regarded by senior Management as the foundations. Should any nonconformance be noted against these requirements, this will trigger an emergency response. In this event, a 14-day action plan will be written and approved by all parties involved and escalated to Senior Management. Should the Emergency Response Action Plan be deemed unacceptable, production will be redirected to other suppliers within GBUK's existing supplier base or suspended until an appropriate action plan is obtained. Action will be implemented within 30 days of the initial nonconformance.

Performance, Monitoring and Measurement

GBUK commits to monitoring the performance and integrity of the LSAS during Management Review Meetings. This will allow all parties to assess the progress and discuss any issues highlighted or issues that have come to light previously. It will also allow the for the set and review of any targets that may be required to ensure the objectives are met and the suppliers remain in compliance. Compliance of all parties in the supply chain will be measured and monitored against the ETI Base Code. GBUKs nonconformance system will be used to document any corrective actions that are required by the supplier. This will ensure full and detailed records as well as ensuring the documents are always kept secure.

ETI Base Code

The ETI Base Code Can be found at <https://www.ethicaltrade.org/eti-base-code>

	Name	Title	Signature	Date
Approved by:	Mike Geering	CEO		15th May 2023