

Ethical Trading Statement 2024

Modern Slavery & Labour Standards

Our Environmental and Ethical Trading Responsibility

GV Health unequivocally condemns modern slavery and Human trafficking with the belief that it should be eradicated.

We are committed to safeguarding the health, safety and well-being of all individuals in which we engage and collaborate with, and enforce a zero-tolerance policy for behaviour which does not align with our ethical trading standards. To enforce our stringent ethical trading policy, we work closely with our global partners with our representatives also being present at each phase within our supply chain. As well as our environmental responsibility, we recognise the importance of broader social responsibility; meaning we are an advocate for Human rights and incorporate this ethos into our responsible business practices.

This statement follows the recommendations within section 54(1) of the UK's Modern Slavery Act (2015)¹.

1 Our Organisation Structure and Supply Chains

Established in 1993, GV Health is an Infection Prevention and Control (IPC) manufacturer located in Hertfordshire, United Kingdom. We manufacture products across the globe, with product quality at the forefront of who we form partnerships with. GV Health is recognised for product innovation, both domestically and internationally, supported by our in-house R&D laboratory and network of warehousing.

Our portfolio incorporates a range of IPC supplies, including hazardous spill kits, healthcare aprons, clinical waste bags and Chlorine based disinfectants. We are a great supporter of education and have a web page dedicated to accessible training, videos and articles within our [Knowledge Centre](#). Our products are used in several major sectors such as clinical/healthcare, janitorial and public/commercial, with a selection of our leading product lines used throughout the UK's National Health Service (NHS).

2 Policies in relation to Slavery and Human Trafficking

Since the introduction of the Labour Standards Assurance Scheme (LSAS) in 2012 – co-authored by the NHS Supply Chain and the UK's Department of Health – the scheme has been an essential requirement for suppliers selling into the NHS. As of 2016, GV Health has implemented and passed the LSAS at level 2. GV Health additionally follows the Ethical Trading Initiative (ETI) base code², which is stated and integrated within our labour standards policy. We abide by a range ethical trading policies, such as Equal Opportunities, Anti-bribery, Health & Safety, and Procurement and Supply Chain Management.

As per the framework of our Management Systems, we must review and maintain our policies annually. We have several company accreditations which is externally audited to ensure that our core business processes continue to align with BS EN ISO 9001, BS EN ISO 13485 and BS EN ISO 14001.

¹ Modern Slavery Act 2015 – www.legislation.gov.uk/ukpga/2015/30/section/54/enacted

² Ethical Trading Initiative base code - www.ethicaltrade.org/eti-base-code

We zealously monitor the organisations that we partner with on an on-going basis (more details in section 6), We check that our suppliers are operating in accordance with their respective country's national legislation, and preserve our labour standards policy throughout each supply chain phase.

During our approval process, we qualify the organisation's ethical trading practices rather than presuming each varying country's national legislation to be aligned with our responsible business practices. This is additionally designed to safeguard Human rights throughout our global supply chain, regardless of geographical location. Our partners are evaluated and qualified using our Supplier Approval Form (SAF) which is completed and assessed for approved by our procurement department and Regulatory Compliance Manager.

3 Risk Assessment and Management

We recognise that some countries may be at a greater risk of modern slavery, and also present risks associated to inconsistent operational practices. We therefore risk assess each organisation to evaluate who we wish to partner with.

As of Spring 2023, we revolutionised our supplier approval process by creating our most encompassing SAF yet. With this form, a variety of in-depth information is gathered on our partners including, but not limited to, production practices, contingency planning, company accreditations, insurance, ethical trading standards, health & safety and sustainability. Gathering the aforementioned information is essential to evaluating each of our partner's capacity and limitations.

We also further mitigate the risk of unethical Human labour by maintaining a healthy network of partners to prevent the prospect of

illegal staff exploitation during high demand production periods.

We only do business with organisations which meet this acceptance criteria. For example, all of our partners must be ISO 9001 accredited, uphold all worker's rights, does not employ child labour, and demonstrates ethical trading practices aligned with our own.

Furthermore, GV Health are a certified Alcumus SafeContractor® and a registered member of SEDEX, evidencing that we translate our beliefs into meaningful action.

4 Due Diligence Processes

Our partners are routinely monitored, and are reevaluated during our Annual Supplier Review (ASR). As part of our ASR, we conduct an electronic audit on every supplier to investigate their business activities and working conditions. Staff from our organisation subsequently follow up by conducting a physical site visit to all manufacturing premises. As a result of these audits, we are able to identify labour rights issues within our supply chain and evidence our Corporate Social Responsibility ethos accordingly. Throughout the year, our procurement department manages the SAF which is referenced upon our ASR evaluation.

If at any time we suspect unethical standards or criminal activity, we automatically de-list or terminate trade with the supplier, even if the organisation is not found to be complicit.

As best practice, each one of our suppliers - from the smallest to the largest - are evaluated to ensure that we are fairly assessing the risk and severity of unethical trading. We recognise the importance of assessing all organisations equally, and not on an individual or country basis. We acknowledge that countries have varying legislation on labour laws and worker's statutory rights; we therefore uphold each



supplier with the same level of scrutiny to proportionately assess the risk of modern slavery throughout our international supply chain.

If any ETI Base Codes have been breached or gaps in ethical trading practices have been identified, the supplier is required to provide an action plan highlighting gaps in their process, root cause of incidents and the corrective actions in which they are to undertake within an agreed timeframe. We have not currently identified any labour right issues in our supply chain.

5 Training on modern slavery and trafficking

As cited in section 1, GV Health is a great supporter of education and training for everyone. It is our ethos to make sure that our staff are adequately knowledgeable, skilled, and fully engaged in the effective integration of our management systems.

Upon induction at GV Health, all staff undergo ethical trading training; thereafter training is refreshed during our annual ISO & Regulatory Compliance presentation. On-going training is used to solidify a rooted awareness of how our business practices can contribute to the eradication of modern slavery and our social responsibility to improve the quality of life for the workers in our supply chain.

While we are required to conduct routine training, as per the requirements of our QMS, we believe that training yields supplementary ethical trading benefits such as effective risk management, consistent process adherence, and improved compliance. This in turn creates a culture for continuous improvement which we are an advocate of.

6 Key Performance Indicators to Measure Effectiveness of Steps

We monitor our suppliers by setting Key Performance Indicators (KPIs). Each supplier

has the same underlying KPIs to maintain satisfactory performance and consistency. In addition to this, several bespoke KPIs are established to measure the effectiveness of each supplier's core business processes, taking into account the strengths of an organisation and areas to improve on.

Our supplier's KPIs are analysed no less than every quarter with senior management. The aforementioned indicators are consequently amended to confirm that the supplier and their KPIs are adequate and just.

During our ASR, we reference the supplier's KPIs and their SAF to conclude whether our ethical trading policy is preserved. Our procurement department escalates all non-conformances and aims to resolve any offenses within 20 business days from the event's occurrence. A secondary review is issued within 12 weeks alongside our Regulatory Compliance Manager for major non-conformances. All non-conformances are inspected by our Regulatory Compliance Manager, which is subsequently reported to the board annually.

Our Commitment

Our ethical trading policy encourages a systematic approach to identify and manage the risks of modern slavery, while upholding worker statutory rights. Our ethos embeds our business core principles and our on-going commitment to continually improvement.

Our mission is to help create healthier, safer, human environments in the most sustainable way possible.

Signed on behalf of GV Health,
Catherine Pegna, Managing Director.