

Modern Slavery Policy for Gapmed UK (2015)

1. Statement

Gapmed Ltd is committed to combating modern slavery and human trafficking in all its forms. We believe in upholding the highest standards of ethical conduct and respect for human rights within our operations and supply chains.

2. Gapmed Procedure

Background checks: Gapmed purchases are less than 5% of revenue so whilst materials supply chain risk is low, we are not complacent. We conduct thorough due diligence and risk assessments to identify and mitigate the potential risks of modern slavery within our personnel supply chain. We have educated the company on the signs of modern slavery, which can include physical abuse, restricted movement, poor living conditions, unpaid wages, excessive working hours, and fearfulness. During selection processes we are conscious to signs of such as fear, anxiety, depression, or reluctance to communicate about individual circumstances. We seek to built trust and listen to ascertain if the person could be under duress.

Zero Tolerance: We have a zero-tolerance policy towards any form of modern slavery, including forced labor, human trafficking, and child labor.

Supplier Engagement: we communicate our Supplier Code of Conduct, which prohibits any involvement in modern slavery practices.

Employee Awareness: we provide ongoing training and awareness programs for our employees to recognise the signs of modern slavery and to know how to report any suspicions responsibly.

Reporting Mechanism: We have established a confidential reporting mechanism that allows employees, suppliers, and stakeholders to report any concerns related to modern slavery. We ensure that whistleblowers are protected from retaliation.

Investigation and Remediation: In the event of any reported incident, we will conduct thorough investigations and take appropriate remedial actions. We will cooperate with law enforcement and relevant authorities as needed.

Continuous Improvement: We are committed to continuous improvement in our efforts to combat modern slavery. Regular reviews and evaluations of our policies and practices are conducted to ensure their effectiveness.

Transparency and Accountability:

This statement represents our commitment to transparency and accountability in our efforts to combat modern slavery. It will be published on our website and updated annually to reflect our progress and any new initiatives taken.

3. Conclusion:

At Gapmed, we are dedicated to making a positive impact on society by eliminating modern slavery from our operations and supply chains. We understand the importance of collective action and collaboration to create a world free from exploitation and abuse.

signed of behalf of Gapmed UK

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Giacomo Baldi
CEO
Gapmed
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