

## Procurement Ethical Code of Conduct Policy

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### 1. Introduction

**Global Health and Safety Ltd** ("the Company") is fully aware of the responsibility it bears toward its customers, employees and suppliers. As such we have given ourselves a strict set of ethical values to guide us in our business dealings. We take social and environmental factors into consideration alongside economic factors in making decisions on the purchase of goods from our suppliers. Our purchasing decisions consider the products whole life cost and the associated risks. The Global Health & Safety Ltd. has never made a purchasing decision based solely on cost. Social and environmental factors make a significant impact to our aim of ethical procurement, by minimising any risk of social abuse within the supply chain.

The Global Health & Safety is of the belief that this not only makes commercial sense, it also has the potential to improve the living and working standards of people around the world.

This policy sets out the detailed requirements and minimum expectations of our policy of ethical procurement and code of conduct. This policy addresses the expectation that our staff and suppliers have an innate respect for our ethical standards and that relationships with our suppliers are based on the principle of fair and honest dealings at all times. The principle of fair and honest dealings is extended to all others with whom our suppliers do business, including employees, sub-contractors and other third parties and their local communities.

### 2. Objectives

#### 2.1 Compliance

The Global Health & Safety compliance objective is to adhere to the principles laid out in the NHS Supply Chain Code of Conduct for Suppliers and to seek third party certification to Level 2 of the NHS Supply Chain LSAS standard.

#### 2.2 Ethical Procurement

The Global Health & Safety ethical objective is to ensure that people in the supply-chain are treated with respect and have the following rights with regard to their employment.

- Equal opportunities
- The right to freely choose employment
- Working hours that comply with national laws
- The freedom of association
- Payment of a living wage
- Recognised employment rights
- Recognised safe and healthy working environment.

#### 2.3 Sustainable Procurement

The Global Health & Safety sustainability objective is to ensure a continued acceptance of the need for procurement decisions to be made on delivering ethical trading.

### **3. Commitments**

#### **3.1 Legal Compliance**

We expect our suppliers to comply with all laws applicable to its business. The supplier should support 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 at Work and ILO Codes of Practice where applicable, in accordance with national law and practice.

#### **3.2 Right to a Living Wage**

We expect our suppliers to comply with the respective national laws and regulations regarding working hours, wages and benefits. Wages should not be paid in kind and should be enough to meet the basic needs of the workers. All workers should be provided with written and comprehensible information about their employment conditions in respect to wages before they start employment. Deductions from wages as a disciplinary measure should not be permitted. Deductions from wages covered under national law should only be allowed with the agreed permission of the worker concerned. Any disputes regarding wages should be recorded.

#### **3.3 Environmental Responsibility**

We expect our suppliers to consider their impact on the environment have a responsible attitude towards environmental issues and to strive towards improving their impact on global pollution.

#### **3.4 Employment**

We expect our suppliers to not use forced, bonded or involuntary prison labour. All employees have the right to join or form trade unions of their own choosing and, where a significant proportion of the workforce agree, to bargain collectively. Employees' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

#### **3.5 Avoidance of Excessive Working Hours**

Standard working hours must comply with national laws and national industry standards. All employees should not on a regular basis be required to work in excess of 48 hours per week and should be provided with at least one day off for every 7-day period on average. Overtime requested by the employer must be voluntary and must not be requested on a regular basis.

#### **3.6 Elimination of Child Labour**

We expect our suppliers on principle to not employ children under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not endorsed under any situation if it would hinder a child from completing compulsory schooling or if the employment would be harmful to their health or development. Children and young persons under 18 shall not be employed at night or in hazardous conditions.

#### **3.7 Provision of Regular Employment**

We expect our suppliers to meet obligations to employees under labour or social security laws and regulations arising from the regular employment relationship should not be avoided. Suppliers should where possible avoid labour-only contracting, fixed-term contracts, sub-contracting, or apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

### 3.8 Elimination of Discrimination

We expect our suppliers to have a policy covering equality and there should be no grounds to discriminate when hiring, compensation, access to training, promotion, termination or retirement based on race, religion, age, disability, gender, marital status, sexual orientation, religious beliefs, union membership or political affiliation.

### 3.9 Worker ill-treatment

We expect our suppliers to not use physical abuse or other harassment or verbal abuse with their workers.

### 3.10 Anti-Bribery

Bribes shall not be accepted or offered, under any circumstances, or for any reason. Global Health & Safety recognises that bribery is a criminal offence in the UK and shall comply with the Bribery Act 2010, no matter where in the world the act of bribery takes place. Any acts of bribery by those working for The Global Health & Safety, or on our behalf may result in a prosecution in the UK.

### 3.11 Modern Slavery

Modern slavery is a crime and a violation of our human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

As a small business we are not legally required to publish any statement, that being said we have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners.

## 4. Sustainable Procurement

### 4.1 Monitoring and measuring

The Global Health & Safety will ensure our suppliers meet the ethical targets set out in this document and we will seek to assist them in meeting their own identified targets.

### 4.2 Working in partnership

The Global Health & Safety will seek out suppliers that share our commitment to high ethical standards. We will offer assistance to our suppliers in raising their ability to meet their social accountability targets. We will develop partnerships with our suppliers and work together to minimise the social impacts of our supply chain.

### 4.3 Procurement process

The Global Health & Safety will attempt to influence and encourage suppliers in order to create a more reliable marketplace for ethically produced products. Social factors are and

will continue to be considered a key part of the purchasing process. Specifically this includes considering where the product is made, by whom and whether the organisation complies with local laws and regulations.

## **5. Safe and Healthy Working Conditions**

The Global Health & Safety our suppliers to provide a safe and healthy working environment which is regulated to international standards and the prevailing knowledge of the industry. The Global Health & Safety expects our suppliers to put in place preventative action to prevent accidents, injury to health and minimise the causes of hazards inherent in the working practice and environment.

The Global Health & Safety expects our suppliers to provide workers with suitable and sufficient health and safety training so they are fully aware of the hazards associated with the work environment and the correct practices required to minimise the risks.

The Global Health & Safety expects our suppliers to provide suitable and adequate welfare facilities including toilet facilities, drinking water and food storage where required. Global Health & Safety expects our suppliers to assign a senior management representative responsibility for health and safety.

## **6. Best Practice Principles**

### **6.1 Making a difference**

The Global Health & Safety expects our suppliers to focus attention on those parts of the supply chain where the risk of not meeting these requirements is highest and where the maximum difference can be made. The Global Health & Safety's suppliers should be prepared to demonstrate the basis of their approach with regard to the above.

### **6.2 Awareness raising and training**

The Global Health & Safety currently expects our suppliers to ensure that all necessary people are provided with appropriate training and guidelines to implement the requirements of this policy.

### **6.3 Working together and Improvements**

The Global Health & Safety will work collaboratively with suppliers in implementing this policy. Our aim is to identify suppliers that fall below this policy and work with them to ensure compliance within an agreed timeframe. The Global Health & Safety will not do business with a supplier where serious conflicts with our policy are identified and where the supplier consistently fails to take corrective action within an agreed timescale.

### **6.4 Independent verification**

The Global Health & Safety recognises that the implementation of this policy may at times be assessed through independent verification. We will expect our suppliers to provide reasonable access to all relevant information, premises, and workers and co-operate in any assessment against our policy. There is an expectation that the supplier will ensure that subcontractors do the same.

## **7. Responsibility of Implementation**

Responsibility for the achievement of this policy and our objectives rests with the Management Team comprising of the COO and the Compliance Manager/Supervisor.

The Compliance Manager/Supervisor is responsible for reviewing the policy and ensuring that it is kept up to date with changes in legislation. The Compliance Manager/Supervisor is

also responsible for providing relevant reports to the board on suppliers who are failing to meet set ethical and social targets.

## **8. Whistleblowing**

Our responsibility as an ethical and compliant supplier is to recognize the importance of staff raising safeguarding issues or other such concerns which are in the public interest commonly referred to as whistleblowing. Whistleblowing is the act of reporting concerns about malpractice, wrongdoing or fraud and is something we take extremely serious at Global Health & Safety. When raising issues these should be shared with the appointed person at the company, this could be your immediate manager or a person of more seniority. At Global Health & Safety the person in overall charge of allegations of malpractice, wrongdoing or fraud is Victoria Guney, COO.

Global Health & Safety expects our suppliers to offer their workers an appointed person to contact in the event of whistleblowing.

The following guidelines are available to workers when raising concerns:

- Identify the following code/guidance/policy or protocol you believe is being compromised.
- Be specific about the issues you are worried about and focus on the facts.
- Set out what you feel should be done as well as highlighting the problem.
- Express yourself in a professional manner, written notes are a good method of clarifying thoughts.
- Wherever possible raise concerns with the support of colleagues.
- Keep a note of all relevant conversations and keep copies of any communication sent or received.

## **9. Evidence of Compliance**

### **9.1 External Monitoring**

Global Health & Safety will obtain and commit to third party certification against a nationally or internationally recognised standard, such as the NHS Supply Chain Labour Standards Assurance Systems (LSAS).

### **9.2 Internal Monitoring**



The Global Health & Safety Management Team will carry out regular monitoring of the implementation of ethical standards to enable us to ensure that ethical and social factors are considered in the procurement decisions.

## **10. Targets**

To demonstrate compliance with this policy standard and objectives, Global Health & Safety will introduce and maintain achievable targets. Ethical targets are set to provide evidence of our commitment to our social responsibility.

- Encourage Ethical Procurement as a core factor in the purchasing process
- Educate all staff members in their responsibility surrounding ethical procurement
- Provide a platform that encourages open communication with suppliers to ensure compliance with this document.

This Procurement Ethical Code of Conduct Policy will be regularly reviewed and updated as necessary. Victoria Gunev, COO, endorses this policy statement and is fully committed to its implementation.

Name:	Victoria Gunev	Gokhan Ayaydin
Position:	COO	CEO
Signature:		
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Rev:	01
Amendments from previous:	NA
Other comments:	None