

Policy: Ethical Trading Policy

1. Summary

- Gamma Gurus Pty Ltd opposes slavery and human trafficking in all its forms. This policy outlines our commitment to ethical trading principles and sets out the steps that we are taking to ensure that slavery and human trafficking is not taking place in our business or our supply chains.
- This statement is published pursuant to section 16 of the Modern Slavery Act 2018, No. 153, 2018 on behalf of Gamma Gurus Pty Ltd.
- Gamma Gurus Pty Ltd is committed to building relationships with local and majority-owned Aboriginal and Torres Strait Islander businesses.

2. Revision and approval

This policy is released and approved as follows.

Rev.	Date	Nature of Changes	Approved By
1.0	15/09/2020	Original issue.	Hans Feitz
1.1	28/07/2021	Updated and expanded	Hans Feitz
1.2	28/07/2021	Added Chapter 8	Hans Feitz

3. Scope

3.1. This policy applies to:

- Directors
- all staff, including managers and supervisors; full-time, part-time or casual, temporary or permanent staff; job candidates; student placements, apprentices, contractors, sub-contractors and volunteers

3.2. Our structure:

- We are a medical equipment supply company, with less than 15 employees within Australia.

3.3. Our supply chains

- Our suppliers come from across the world but mostly within Europe and USA.
- Technology service providers that provide us with the software, equipment and other technology solutions come from within Australia
- Providers of professional services, such as insurers, professional advisers (legal, regulatory, audit, etc.) and businesses which support our day-to-day office operations and help us to run our premises, such as facilities management services (cleaning and security providers), couriers and printing services also come from within Australia.

- In light of our supply chains and the nature of our business, we consider the risk of modern slavery occurring within our business or our supply chains generally to be low.

4. Policy

- 4.1. As a health company, we are committed towards compliance with applicable laws and regulations, acting ethically and with integrity in all our business dealings, and implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place in any part of our business or supply chains.
- 4.2. When recruiting staff directly, we undertake identity checks and ensure staff are aged 16 or above and have the right to work. We adhere to all applicable employment law relating to our employees' terms and conditions, including pay, and all of our employees are paid at least any applicable minimum wage.
- 4.3. Upon induction, and periodically thereafter, staff are required to review our policies and procedures register so they may recognise when additional steps may be required to address modern slavery risks.
- 4.4. We expect all of our suppliers, partners, and customers to conduct their own businesses in a manner which is both lawful and ethical, including adopting good business practices that prevent and eliminate modern slavery and human trafficking.
- 4.5. We regularly review our procedures to identify additional steps we can take to identify and address the risk of modern slavery or human trafficking taking place within our supply chains.
- 4.6. When sourcing supplies and products locally, all staff are required to search for Indigenous Australian and Torres Strait Islander majority-owned and operated companies, wherever possible. All staff should consider Directories of Aboriginal and Torres Strait Islander businesses, such as Supply Nation.
- 4.7. Identified companies from clause 4.6 must be given the opportunity to tender/quote for our business.
- 4.8. No company from clause 4.6 need be prioritised for our business. All Gamma Gurus' suppliers of goods and /or services will be chosen without prejudice and based solely on the competitive value of their tender/quote.

5. Staff rights and responsibilities

All staff are entitled to:

- Benefit from this policy and raise questions with management regarding this policy.

All staff must:

- Adhere to this policy and notify management of any suspected breaches of this policy.

6. Additional responsibilities of managers and supervisors

Managers and supervisors must also:

- Enforce this policy and make decisions based on this policy
- Take note of staff concerns with regards to this policy and act upon it.

7. More information

If you have a query about this policy or need more information, please contact any Gamma Gurus manager or director.

8. Approval details

This policy was approved by the boards of each of the three reporting entities covered by this policy. The board of Gamma Gurus Pty Ltd approved this statement on 27th July, 2021. The boards of Beirne Family Trust Pty Ltd and Feitz Family Trust Pty Ltd approved this statement on 25th July 2021.

This statement was approved by all partners of Gamma Gurus Pty Ltd on 27 July, 2021 and is signed by Jason Beirne, Managing Partner.



Managing Partner for Gamma Gurus Pty Ltd

27 July 2021