

Working Conditions and Human Rights Policy



At GBA we encourage openness and will support anyone who raises genuine concerns in good faith under this policy. We will never victimise anyone who makes a legitimate complaint if they, or somebody else is being harassed or discriminated against.

We are committed to absolute integrity and fairness across all our operations and accordingly will not tolerate any activities that are exploitative or violate human rights or conduct that is dishonest or fraudulent.

Equal opportunity and equal treatment

We are fully committed to promoting fair and equal opportunities in our business operations.

Our employees and stakeholders should never be subject to discrimination or treated unfairly, irrespective of:

- age,
- gender,
- disability,
- sexual orientation or gender identity,
- cultural background or beliefs.

We commit to providing a dignified and respectful working environment and we will not tolerate humiliating or physical punishment or allow any persons to be subject to verbal, psychological, physical or sexual harassment or abuse.

GBA expects and encourages our whole organisation (including all stakeholders) to participate in promoting equal opportunities across all business activities.

Child labour

GBA will not employ children under the legal age of employment in any country or local jurisdiction, and we set a minimum working age of 15 years, even where local legislation may permit this practice.

Anyone under the age of 18 shall only perform work in accordance with legal requirements of their country of employment (e.g. with regards to working time and working conditions). This is to safeguard young workers from conditions of work which are harmful for their health, safety or development.

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Working practices

GBA work to create long-term relationships and we take the health, safety and wellbeing of our employees seriously

Safeguarding systems are followed to ensure compliance with working time directives so that hours worked are not excessive, regardless of local practices.

We ensure we comply with employment regulations and that wages paid, including additional entitlements, are fair and market reflective.

Forced or compulsory labour

We want to ensure that labour is freely chosen. We do not tolerate any form of forced, bonded, compulsory labour or modern forms of slavery from any member of our organisation or stakeholder.

- All labour must be voluntary.
- Workers must be allowed to maintain control over their identification documents (e.g. passports, work permits or any other personal legal documents).
- Workers do not pay fees or make any payment connected to obtaining employment throughout the hiring process and the employment period.
- Punishment, mental and/or physical coercion as well as any other form of human trafficking are prohibited.

Employee representation

Employees can openly communicate and share ideas and concerns with GBA's management regarding working conditions and management practices without fear of discrimination, intimidation or retaliation.

This includes the right to:

- lawfully form, join or not join labour unions
- bargain collectively (being able to negotiate between employers and a group of employees to reach agreement on working practices and conditions).
- seek representation and join worker's councils in accordance with local law and international conventions

This practice is encouraged by employee engagement schemes and robust reporting mechanisms.

Peter Zak

A handwritten signature in blue ink, appearing to read 'Peter Zak', written over a white background.

Dated: 24/4/2023

Managing Director