

Clarity Pharma, Clarity Global Group and Clarity Medtech Ethical Trade Policy

The Ethical Trade Policy of Clarity Pharma, Clarity Global Group and Clarity Medtech (the “Company”) is to ensure so far as it is reasonably practicable that the Company operates with a commitment to engaging, promoting and ensuring fair and ethical trade.

1. How do we engage in and promote Ethical Trade?

- 1.1 As a fair and ethical trade organisation, we have a commitment to fair and ethical trade as the principal core of our mission.
- 1.2 We make every effort to conduct business in accordance with our ethical trade policy and to the highest ethical standards.
- 1.3 We aim to ensure that every product we supply is sourced and obtained in accordance with our ethical trade policy and those ethical standards, in an acceptable manner, in accordance with current best practices, and in particular lawfully, through fair and honest dealing, without exploiting the people who made the products, in decent working conditions, and with environmental impact during production and transportation being reduced.
- 1.4 We endeavour to ensure that all of our producers and their sources adhere to our ethical trade policy but recognise that it is not possible to provide absolute assurance that they producers will do so. Where we identify transgressions by any producer or supplier, we try to work with them to develop an appropriate remediation programme. However, we will stop using any supplier or producer who we find persistently contravenes our ethical trade policy or fails to implement an agreed remediation programme.
- 1.5 Our fair trade policy, as follows, is based on the World Fair Trade Organization’s 10 principles.

2. Creating Opportunities

- 2.1 We work with our producers to develop and introduce new products and improve the producer’s products to make them more suitable for the UK.
- 2.2 We aim to ensure that the quality of each type of products that we source is the best available.
- 2.3 The quantities of many of the products that we source from such are sufficient to make a real difference to their business.
- 2.4 We work with our producers to create a happy, trusting and long-term relationship with them. We aim to ensure that our producers and suppliers have a dependable and regular source of income which helps them create a secure and stable lifestyle.
- 2.5 We help market our products by emphasising to our customers and prospective customers the technical skills involved which make their products special.

3. Transparency and Accountability

- 3.1 Certain commercial information needs to remain confidential, but, subject to that, we aim to act with transparency and accountability in all our dealings with our producers and suppliers, and we have open discussions with them about our and their business plans and aspirations.

4. Paying a Fair Price

4.1 We agree and pay our producers and suppliers for products a fair price which is acceptable to them and which ensures that they are adequately compensated for their work and skill.

5. Fair Trading Practices

5.1 We adopt fair trade practices in our dealings with our producers and suppliers.

5.2 We want to spread the word that fair trade is the best way to trade, and we communicate this as much as possible.

6. Ensuring no Child Labour or Forced Labour is Employed

6.1 We ensure that no child labour is used in the making of products that we sell. For this purpose, we adopt the same age used by the International Labour Organization Convention No. 138 to define "child", namely the age of 15 years, or, where any such product is produced or worked on in any country where the minimum age for completion of compulsory schooling is greater than 15, then we apply that greater age instead.

6.2 Further, we make sure that where any person who is under 18 but 15 or over (or if greater, the minimum age for completion of compulsory schooling in their country) is involved in producing any of the products that we sell, neither the nature of their work nor the circumstances in which it is carried out is likely to jeopardise their health, safety or morals.

6.3 We ensure that forced labour, whether in the form of prison, bonded or uncompensated labour is not used.

7. Commitment to Non Discrimination

7.1 We believe in equality and fairness for all and do not discriminate or tolerate discrimination of any type on any basis against any of our employees, regardless of age, sex, race, religion or disability. We also expect our producers and suppliers to do the same and to provide equal opportunities and pay for all.

8. Ensuring Good Working Conditions

8.1 Our own employees enjoy good general working conditions, and in particular a safe and healthy environment.

8.2 We require our suppliers and producers to meet their local laws on working conditions, welfare health and safety, minimum wages, hours of work, overtime and deductions.

8.3 We require our suppliers and producers to make every effort to ensure that:

8.3.1 accidents or injury in the workplace are prevented;

8.3.2 health and safety procedures are implemented and employees are regularly trained and tested in what to do in certain situations;

8.3.3 there is always adequate lighting and ventilation;

8.3.4 clean drinking water is always available.

8.4 We do our best to both raise awareness of health and safety of employees, and to encourage them to improve their health and safety practices.

8.5 We require our own employees to treat all of their colleagues with respect and dignity and ensure that no employee is treated with threatening behaviour, physical punishment or any form of mental or verbal abuse. We also require our producers and suppliers to do the same.

9. Providing Capacity Building

9.1 We try to help our suppliers and producers grow their business by providing them with any advice, training or contacts that we can, and by working with them to build capacity through development of management skill.

10. Respect for the Environment

10.1 We minimize our environmental impact and help our suppliers and producers to do the same by trying wherever possible to use recycled materials in the products, by trying to reuse packing materials, returning to the manufacturer toner cartridges from printers that we use, recycling cardboard waste, and reducing our use of paper.

10.2 We are continuing to develop our environment practices in the production of the items that we sell.

This Policy has been approved and authorised by:

Name: Oliver Law

Position: Group Managing Director

Date: 27th May 2021

Due for Review 28th May 2022

by:

Signature:

