



Modern Slavery Statement – 2022

Modern Slavery in 2022

Over the past two years the world economy has faced disruptions unprecedented in recent years, with COVID, the Ukraine crisis and ongoing disruption to supply chains from climate change all contributing to a vastly different landscape for businesses dealing with global supply chains. This disruption is likely to continue in the coming years and pressure on global supply chains will grow, as a result businesses may be forced into new situations or relationships at short notice. Due to this the requirements for businesses to proactively manage the risks, including Modern Slavery Risks, in their supply chains are more important than ever.

Our commitment to the transparency and integrity of our supply chains as been reflected in the publication of the Bluetree Group Sustainability Strategy. This strategy outlines the businesses sustainability ambitions in line with the frameworks of the Paris Agreement and the UN Sustainable Development Goals and is underpinned by our four pillars of sustainability: Carbon Reduction, Prosperous Environment, Sustainable Value Chain and Positive Stakeholder Engagement. The delivery of the Sustainability Strategy will facilitate the Bluetree Group's aspirations of creating a world where the profitability of business is not at the expense of the environment and where all are empowered to enjoy a good quality of life through the delivery of fair and transparent operations and value chains.

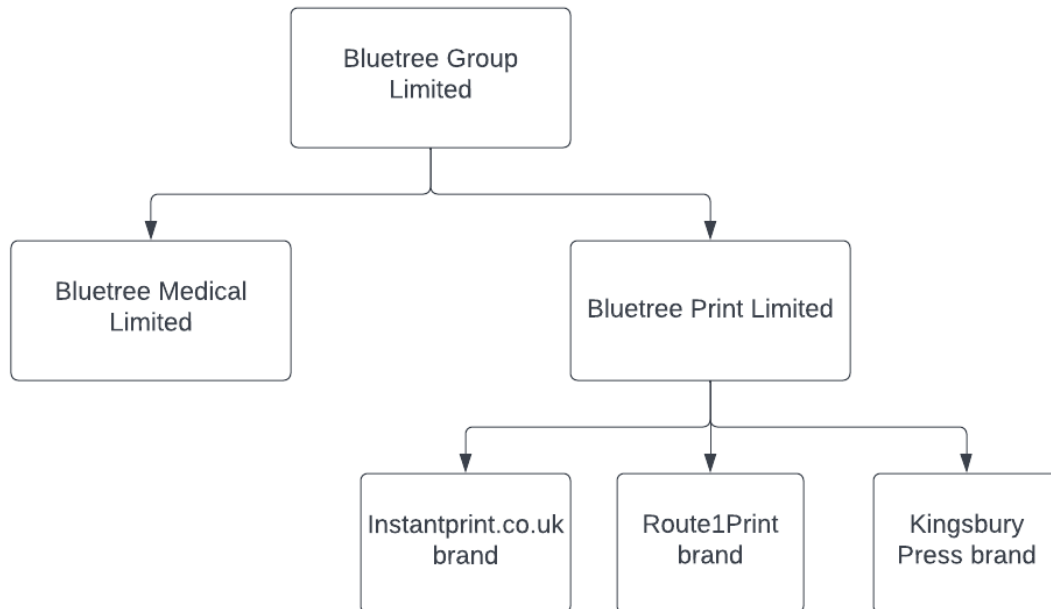
Who are Bluetree Group?

Bluetree Group is a fast-growing award-winning manufacturing business based in South Yorkshire. We're a Sunday Times Fast Track 100, London Stock Exchange 1000 Companies to inspire Britain, and European Business Awards UK Manufacturing winner. The company has two divisions, Bluetree Print and Bluetree Medical which between them employ a team of over 600.

We operate out of three different manufacturing hubs, all of which are ISO 9001/13485 Quality Management system certified facilities. In addition, all our operations are ISO 14001 Environmental Management system certified, and in 2021 we became a certified Carbon Neutral organisation committed to a Net Zero target 2030 under a certified Carbon Reduction scheme.

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Bluetree Group Corporate Structure



How we tackle modern slavery risks within our organisation

Our Team Experience Department and wider Management Team are responsible for ensuring that we have the right Internal policies and processes in place to proactively tackle modern slavery, human trafficking and labour standards concerns, including:

- We are an accredited Real Living Wage Employer which means that all our employees are paid the Real Living Wage which is higher than the Governments recommended hourly rate.
- When onboarding our colleagues, we have some strict internal processes which we follow to ensure that our colleagues are employed legally, fairly, and ethically.
- All employees are issued contracts of employment electronically before their first day of work and are given their own personal copy of this to keep and refer to.
- All employees must provide official proof of their identification so that we can check they are who they say they are, are of the legal working age and have the right to work in the UK
- All colleagues are paid weekly into a named bank account, and changes can only be made by the employee and verified by a member of the HR team.
- All employees clock in and out of the business so that we can ensure they are paid fairly for the time they have worked.
- We have a published recruitment policy which includes a section of conflict of interest. This means that any conflict of interest between a panel member and a candidate must be declared.
- As a business we are committed to phasing out agency workers where risk of exploitation and underpaying is in the hands of an external supplier.
- The business has a long-established Grievance policy (updated March 2022) which is published in our company handbook and on our intranet. This grievance policy encourages individuals to raise problems or issues that they may have with other colleagues, managers, or teams so that they can

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be resolved in a fair and constructive way. This would include the ability to raise concerns about exploitative working or practices internally or by our suppliers or customers.

How we tackle modern slavery risks outside our organisation

Our Supply chains

Each of the two business divisions within the Group operates in different manufacturing sectors, and whilst there are some overlaps between the two, the overall supply chain picture is different for each area.

On the Print side of the business, paper and board are the biggest resources that we consume, which we source from several suppliers and paper mills across Europe. Fortunately, the paper supply chain is well regulated through certification schemes such as FSC.

All the paper and board that we buy is FSC certified, this means that it originates from forests, mills and suppliers that are certified by FSC as responsibly managed. Responsibly managed means that the forests are sustainable, wildlife and indigenous peoples are protected, and workers' rights are respected.

Principle 2 of the FSC Forest certification standard covers workers' rights and employment conditions. This means that for an organisation to achieve FSC Certification that organisation must demonstrate that it 'shall maintain or enhance the social and economic wellbeing of its workers'. This includes the following criteria:

- 2.1 The Organization shall uphold the principles and rights at work as defined in the ILO Declaration on Fundamental Principles and Rights at Work (1998) based on the eight ILO Core Labour Conventions.
- 2.2 The Organization shall promote gender equality in employment practices, training opportunities, awarding of contracts, processes of engagement and management activities. 2.3 The Organization shall implement health and safety practices to protect workers from occupational safety and health hazards. These practices shall, proportionate to scale, intensity, and risk of management activities, meet or exceed the recommendations of the ILO Code of Practice on Safety and Health in Forestry Work.
- 2.4 The Organization shall pay wages that meet or exceed minimum forest industry standards or other recognized forest industry wage agreements or living wages, where these are higher than the legal minimum wages. When none of these exist, The Organization shall through engagement with workers develop mechanisms for determining living wages.
- 2.5 The Organization shall demonstrate that workers have job-specific training and supervision to safely and effectively implement the management plan and all management activities.
- 2.6 The Organization through engagement with workers shall have mechanisms for resolving grievances and for providing fair compensation to workers for loss or damage to property, occupational diseases, or occupational injuries sustained while working for The Organization.

The hard work of organisations like FSC and our commitment to only buy paper and board that comes from FSC certified sources allows us to feel confident about the absence of modern slavery in the supply chain of our biggest resource and is why we are proud to be an FSC certified organisation ourselves and support our FSC certified suppliers.

Our Medical Consumable products mainly rely on various plastic and metal components that form our devices. These components are petrochemical derivatives and are sourced from verified suppliers, all of which are reviewed for their Modern Slavery credentials prior to



being used by the business. These checks are stored and available on request for interested parties.

Common to both divisions are electronic consumables and equipment used in our manufacturing facilities. Equipment is sourced from major manufacturers based in Europe, Japan, and the US. Electronic equipment are an identified risk area when purchasing from certain areas of the world as detailed in the risk assessment section below, we mitigate this risk by sourcing our electronic consumable from only two suppliers both of whom provide detailed information about the way they manage modern slavery risks in their supply chains.

Supply chain risk assessments

As a business we assess our supply chain to understand if there are any potential areas of risk when it comes to modern slavery;

- Risk as identified in The Global Slavery Index highlights 15 product categories that are at high risk from Modern Slavery. Of these the only three that impact on Bluetree's supply chain are Timber, Consumer Electronics (such as laptops and mobile phones) and garments.
- Timber sourced from Brazil, North Korea and Peru are raised as possible concern, however our paper and board is all FSC certified, comes from European sources and therefore is unlikely to have Modern Slavery risks.
- As a technology driven company we use large volumes of computers, laptops and other electronic goods. These are sourced from a mixture of electronic equipment manufacturers and suppliers, as well as using refurbished equipment sourced locally. Our partnering with two electronic equipment suppliers has allowed us to mitigate this risk.
- Some medical device components may fall under the garments category however through our Modern Slavery checks all of our suppliers of these components are actively tackling modern slavery in their supply chains.

What have we done?

In the past twelve months we have worked in the two areas of identified risks to add additional controls for our suppliers, including expanding our Supplier Evaluation procedure within the medical division to include due diligence checks for Modern Slavery controls.

We have partnered with two electronic consumables suppliers who we have high confidence in the controls they exercise in their supply chains for modern slavery risk.

We have hired a Sustainability Manager who, alongside other elements of Sustainability, will work to develop our next round of modern slavery risk management processes as part of our wider Sustainability Strategy.

We implemented a whistleblowing policy within the Group to allow the free reporting of any areas of concern within business operations and the supply chain without fear of repercussions.

What are we doing in the next 12 months.

We recognise the complexities and risks associated with operating across multiple manufacturing sectors and are committed to expanding our understanding of our supply chain across all areas of Sustainability, with Modern Slavery being a major element of this.

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Detailed in the Sustainability Strategy, by 2030 Bluetree will operate a transparent and socially responsible value chain. This will be facilitated by what we call our 'Value Chain Management' project, where we will implement a system solution to fully map, understand and influence our entire supply chain to ensure we maintain our modern slavery free value chain as well as create mechanisms to identify and improve other areas of concern.

Utilising the technology and data available we will map the risk of Bluetree operations across the entire value chain against 6-key project areas including: Labour Standards and Modern Slavery, Ethical Procurement, Carbon, Sustainable Procurement, Quality and Supply Chain Resilience. Functioning as an ongoing, in-depth process, this exercise will transition to a risk management solution whereby Bluetree can influence and engage with suppliers to create a resilient and transparent value chain that can withstand environmental, social, economic, and geopolitical disruptions without compromising on the integrity of modern slavery and our sustainability ambitions.

A closing comment from Adam Carnell, our Managing Director

"I am pleased with the steps taken so far by Bluetree Group to manage the risks posed by Modern Slavery in our supply chain. Our Modern Slavery Statement for 2022 is an encouraging read, and we are incredibly pleased to see that we are taking action to understand and tackle this issue, the Value Chain Management project that we are launching is an exciting one and I am confident will allow Bluetree to become a force for positive change in our relationships with our suppliers."

Adam Carnell, Co-CEO

A handwritten signature in black ink, appearing to read 'Adam Carnell', is shown on a light-colored background.

23/08/2022