

Bluetree Group Labour standards policy

March 2023

This policy summarises the underlying framework for Human Resources, Human Rights and Labour Standards as approved and published internally for Bluetree Group Limited. Bluetree are committed to ensuring both the Group and its suppliers always achieve the acceptable labour standards.

Bluetree Group labour standards

In conducting its business and striving to meet the business objectives, our employees and directors will adopt the following principles:

- Exercise honesty and diligence in performing their duties and undertaking their responsibilities
- Maintain high standards of integrity, morality and competence
- Not contravene national laws and relevant regulations in the conduct of their duties
- Not enter into any activity that may result in a conflict of interest with the company
- Not accept anything of value which could be described as an inducement or which could impair their judgement
- Not use the company's confidential information for personal gain
- Not act in a manner that could discredit the company, customers or suppliers
- To operate an ethical workplace
- Not permit any act by an employee that is considered to be corrupt either under relevant law or by reference to good business practice Fairness and Human Dignity

Fairness and Human Dignity

It is Bluetree Group's commitment to provide a workplace environment where employees are recognised as the most valuable asset, treated with respect, dignity and consideration. This commitment is built upon a framework of policies, procedures and our company values designed to ensure fairness in the recruitment, retention, training, and development of all employees.

Discrimination

Our employment policies for recruitment, selection, training, development, pay and promotion are designed to ensure that no job applicant or employee receives less favourable treatment on the grounds of age, race, colour, nationality, ethnicity, religion, gender, marital status, disability, sexual orientation or offending background that does not create any risk to the company, colleagues, vulnerable adults or children.

Subject to the need to ensure necessary protection as above we will make every effort to prevent discrimination against those with criminal records.

- All recruitment procedures are designed to encourage applications from all sections of the community and all abilities.
- We ensure all application processes are user friendly and avoid unnecessary barriers
- We will continue to identify underrepresented, disadvantaged or excluded groups

- Bluetree Group seeks to provide equal employment opportunities for all staff and will comply with all relevant employment and equalities legislation and regulations at all times.
- Bluetree Group will continually monitor the implementation of their recruitment policy to ensure that all staff are treated fairly, minimising the risk of any direct or indirect discrimination practices.

Human Rights

- Each person that is employed by Bluetree Group shall be treated with dignity and shall not be subjected to any harassment, physical or mental punishment or other forms of abuse.
- We promote effective engagement throughout our business and welcome open and sincere feedback from all colleagues on all matters of the company's business interest.
- There is an effective Grievance management process in place, which is transparent, and equitable to enable the remediation of any abuse of human rights and the impacts that may arise.
- All employees are bound by the working time directive which is monitored on a weekly basis via the management team.

Child Labour & Forced or Compulsory Labour

- Bluetree Group does not and will not engage in or support the use of child labour. If we engage any young workers (e.g. for work experience) we ensure that a suitable risk assessment is carried out and that the young persons are not exposed to any hazardous condition.
- We shall adhere to and strictly comply with International child labour conventions and Child Labour Laws and regulations
- In the same manner, Bluetree Group will not engage or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave after providing reasonable notice in line with their individual contracts of employment. All employees shall provide their services to the company on an entirely voluntary basis and no one shall be forced to remain in the employment of our Group against their will.

Freedom of Association

- We believe in the power of direct engagement with our employees. As a business we are part of the British Printing Industries Federation (BPIF) which is a recognised body within the print industry, we also recognise and respect the right for our employees to freely associate with any other organisations which exists to further and defend their interests in the workplace.
- Our employees shall not be dismissed or otherwise prejudiced for the reason of membership of such an employee organisation or because of participation in that organisation outside of working hours, or with consent of their line manager, within working hours.
- Our employees shall enjoy protection against discrimination by virtue of their membership of an employee organisation and employment shall not be conditional upon an employee joining or not joining or relinquishing membership of such organisation.
- Bluetree Group recognises that as a business we employ people from such diverse backgrounds encouraging the difference in political views and reasoning and enabling our colleagues the freedom of speech.

Health and Safety

Bluetree Group are committed to ensure that the health and safety and welfare of their employees, contractors, customers and others who may be affected by our undertakings are suitably maintained and managed.

The Directors of the business accept ultimate responsibility for ensuring the site's compliance with Health and Safety legislation and implementation of the health and safety policy. The day-to-day implementation for Health and Safety lies within the Compliance department.

It is our aim, in so far as reasonably practicable, to ensure that:

- The company is committed to operating its businesses in accordance with all applicable regulations along with any other requirements.
- We continuously seeking to improve our performance through inspection, internal auditing and review of all the activities under our control with participation from employees and stakeholders.
- We are committed to ensure the health safety and welfare of employees, contractors and visitors.
- We undertake and continuously review a programme of risk assessments in all significant areas of our business and address any areas of deficiency as appropriate.
- We adopt compliant practice with written procedure and processes.
- We assist all employees in carrying out their health and safety duties by facilitating the provision of specialist technical advice, guidance and training as and when required.
- We provide information, instruction, training and supervision to cover all activities under our control.
- All employees are aware of how to bring any concerns to the attention of management.
- We have effective and tested emergency procedures in place to control emergency situations as identified in the sites emergency procedure.
- Suitable welfare facilities are in place for all our employees, contractors and visitors whilst they are on Bluetree Group premises.
- We provide a safe and healthy working environment, in so far as is reasonably practicable to ensure that all our employees and others affected by our operations are exposed to minimal risk of accident / injury in the workplace and of developing work-related ill health.
- To provide and maintain consultation with all employees on any measures at the workplace which may substantially affect the health and safety of employees.
- Promote a culture in which managers visibly demonstrate health and safety leadership, direction and participation

Working Hours/Periods

Bluetree Group shall comply with applicable laws and industry standards on working hours and holiday entitlements.

Remuneration

- We shall comply with national laws and regulations with regard to wages and benefits in all of our business operations. All work-related activities are carried out on the basis of a recognised employment relationship established according to national law and practice. At Bluetree Group we are also proud to be an accredited 'Real Living Wage' employer.

- We pay overtime rate at a minimum rate of a time and a third for any employee that exercises their right to partake in overtime. Bluetree Group set out their requirement for overtime on an ongoing basis but do not force overtime to our colleagues.
- Bluetree operates a pay review policy to ensure that there is a fair process for reviewing remuneration across the business.

Suppliers

Bluetree Group seeks to develop long-term business partnerships with reputable suppliers across both Divisions of the business (Bluetree Print & Bluetree Medical). These partnerships can only be successful if suppliers have a mutual respect for our Ethical Standards.

Our relationships with our suppliers are based on a commitment to compliance with the Modern Slavery Act 2015 and all laws concerning Labour Standards and Human Rights at all times. We believe mutual respect must be extended to everyone along the Supply Chain including employees, sub-contractors and other third parties.

It is recognised that within some countries there are legal and cultural differences from our own, but it is essential that all the factories involved in supplying the company meet the local Labour laws and carry out their business practices with good ethics and protection of their workforce.

Detailed below are areas that we require all of our suppliers to stand by that our company also pledges to stand by:

- The use of child labour is not acceptable. Employees within the factories must meet the minimum legal working age and must not be less than 14 years of age whichever is the greater.
- The use of forced labour or involuntary labour of any kind is not acceptable.
- Companies that withhold passports of staff or have staff that have outstanding Recruitment Fees paid personally to secure their current job cannot be a supplier of Bluetree Group.
- The use of any form of physical abuse to coerce or punish workers is not acceptable.
- Additionally, the use of non-physical abuse such as threat of violence, sexual harassment or verbal abuse is also not acceptable.
- Discrimination against a person or group as a result of race, religion, colour, gender, nationality, age, maternity, marital status or disability is not acceptable.
- Suppliers must ensure that all working premises comply with all applicable laws regarding working conditions, worker health and safety, fire, safety, risk protection, sanitation, electrical and structural safety.
- Working Hours / days, wages, over-time pay and holiday pay must be in compliance with all local laws and must meet the legal minimum wage or a wage that meets local Industry standards, whichever is greater.

Responsibilities and Raising of Concerns

The implementation and monitoring of this policy is the responsibility of Bluetree Group's Directors. Managers at all levels within Bluetree Group are responsible for ensuring those reporting to them understand and comply with this policy. Employees and associated persons are required to notify Bluetree Group as soon as possible if it is believed or suspected that a conflict with this policy has occurred, or may occur in the future, or that they are a victim of another form of unlawful

activity. This policy is relevant to the company itself, our contractors, sub-contractors, suppliers, freelancers, and other parties engaged with Bluetree Group. We reserve our right to terminate our contractual relationship with any third-party suppliers if they breach this policy. All persons engaged with Bluetree Group shall ensure that they read, understand, and comply with this policy. They are required to avoid any activity that might lead to or suggest a breach of this policy. Employees shall notify their respective manager or director as soon as possible if they believe or suspect that a conflict with this policy has occurred or may occur in the future. If a breach of this policy is believed or suspected to have occurred, the employee shall notify a manager or director or report it in accordance with our whistleblowing policy as soon as possible. Bluetree Group is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion of a breach of the minimum standards

Anyone wishing to report any violation of these standards can email whistleblowing@bluetreegroup.co.uk

Signed for and on behalf of the Company Management:

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

Adam Carnell

03/03/2023