

Modern Slavery Statement

Updated August 2025

This Modern Slavery statement is applicable to Bluetree Group Ltd and the businesses that fall within Bluetree Groups corporate structure, namely Bluetree Medical Ltd and Bluetree Print Ltd.

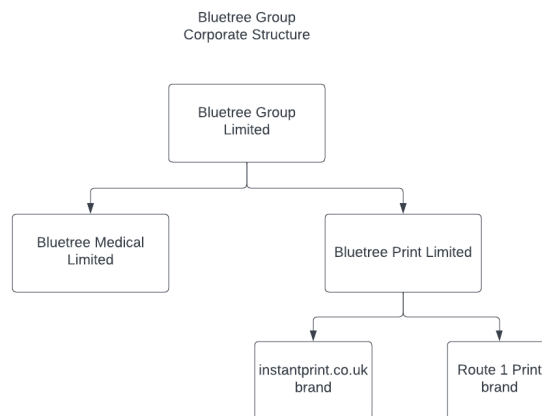
Modern Slavery in 2025

The importance of tackling the risks of Modern Slavery remain as important now as they did when the Modern Slavery Act was passed in 2015. Statistics on the subject paint a picture of a challenging situation, both in the UK and across global supply chains. In the UK referrals to the UK governments Modern Slavery referral mechanism hit an all time high in 2024, with 19,125 potential victims of modern slavery reported. This represents a 13% increase on 2023¹. The Global situation remains concerning, with an estimated 50 million people living in modern slavery around the world².

At Bluetree we continue to work towards the goals set out in our 2022 Sustainability Strategy, which includes commitments to working towards achieving a fair, transparent and stable value chain. This statement will draw on the work done as part of this strategy, if you would like to see the strategy and our annual report which details progress please visit our website.

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 400 people.



¹ 'Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary 2024', UK Government - Home Office <<https://www.gov.uk/government/statistics/modern-slavery-nrm-and-dtn-statistics-end-of-year-summary-2024/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2024>> [accessed 12 August 2025].

² 'The Global Slavery Index', Walk Free <<https://www.walkfree.org/global-slavery-index>> [accessed 14 August 2024].

How we tackle modern slavery risks outside our organisation

Our supply chains.

Our products and processes rely heavily on timber and paper/board supply chains as paper and board are the biggest resources that we consume. Fortunately, the paper supply chain is well regulated through voluntary certification schemes such as FSC^{®3}.

We are Certified ourselves, and all these controls also apply to us. Our FSC[®] Certification licence code is FSC-C013249, you can find details on the FSC[®] licence checker website <https://search.fsc.org/en/>.

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.

³ For more background information on the work that the FSC do, please see: 'How the FSC System Works', *Forest Stewardship Council* <<https://fsc.org/en/how-the-fsc-system-works>> [accessed 14 August 2024].

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.

As a tech heavy business, we are a big user of electronic consumables and equipment used in our manufacturing facilities. Equipment is sourced from major manufacturers based in Europe, Japan, and the US. Electronic equipment is 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 working with vetted UK suppliers and work with them to understand and avoid the areas of greatest concern.

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 two that impact on Bluetrees' supply chain are Timber and Consumer Electronics (such as laptops and mobile phones).
- Timber sourced from Brazil, North Korea and Peru are raised as possible concern. Most of our paper and board suppliers are based in Europe, we also use some non-European based suppliers, including from potentially higher risk sources. Where these suppliers have been onboarded we have fully reviewed the individual supplier through the due diligence process outlined below, and through our policy of using only FSC Certified paper and suppliers we are confident that working with these new suppliers hasn't introduced additional risk into the supply chain.
- 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.

What have we done? - Understanding and Influencing our Supply Chain

One of the core pillars of our Sustainability Strategy is the principle of "Sustainability at the Source." This approach reflects our commitment to working closely with our supply chain to understand and mitigate risks, including those related to modern slavery.

In summer 2023, we launched the first phase of our Value Chain Management project, designed to strengthen supplier engagement and gather information through questionnaires, followed by direct dialogue and relationship-building. This work continued in 2024 with the launch of a second supplier cohort. Learning from the challenges of the first round, particularly with larger corporations where engagement proved difficult, we refined our approach. While the first cohort focused on suppliers representing our top 80% of spend, the second excluded some of the largest companies, while still aiming for the same spend coverage. As a result, the number of suppliers engaged increased significantly, from 34 in 2023 to 68 in 2024.

We achieved engagement with 45% of the first cohort and 36% of the second, while the second year yielded a lower percentage, overall, it covered a larger number of suppliers. Across both, we observed the strongest responses from our core raw material suppliers, with whom we have long-standing relationships. The information collected to date confirms that our direct suppliers represent a low risk for modern slavery. None of the suppliers engaged so far have been identified as medium or high risk. Feedback from both cohorts has informed the evolution of our strategy.

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.
- Prior to contracts being issued in person Right to Work checks are performed by the team.
- 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.
- As a business our default is to rely on our own internally employed team and where possible not use temporary workers, when we do use them we only work with temp agencies that have robust Modern slavery policies and procedures and we ensure that they comply with all relevant agency worker and employee regulations.
- The business has a long-established Grievance policy (updated March 2022) which is published on our company 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 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.
- We also have a Whistleblowing process as part of our Labour standards policy (November 2023), which provides an anonymous reporting mechanism for individuals at Bluetree or from organisations we work with to flag potentially exploitative working practices.
- All the above company policies and processes are trained to all line managers through our Learning Management System portal, so they have a clear understanding of our responsibilities as a business, and their role in delivering them.
- To prevent third parties from influencing our employees financial situation all requests for information about and/or changes to employee bank details must come through our internal HR system from the employee and verified by our HR team.

What are we doing in the next 12 months.

While mapping our value chain remains a priority, we are refining the process to ensure it is practical and manageable for suppliers. For Cohort Three (2025–26), we will move away from the “80% of spend” target and instead prioritise our primary paper and ink suppliers, which account for the majority of our spend.

Once we have built confidence and trust with our tier-one suppliers, we will begin mapping subsequent tiers of the supply chain. Establishing open, collaborative relationships is a prerequisite for this next stage, and fostering these partnerships is a central aim of Cohort Three.

A closing comment from Adam Carnell, our Co-CEO

“The work that the team have done to understand the risks in our supply chain has made some good progress, it is clear that there have been some challenges in direct engagement with the broad stretch of our all of our suppliers. The decision to focus on our key suppliers and the plans to build good relationships with them will allow us to achieve greater engagement, and therefore better understand and mitigate any risks that might occur.”

Adam Carnell, Co-CEO



29/08/2025