

## Bluetree Medical Modern Slavery Statement

March 2021

At Bluetree Medical there is no place for Modern Slavery and our first Modern Slavery Statement aims to reflect this. With the creation and growth of the Medical Division, the landscape for the business is now very different and actively combatting Modern Slavery will be a central part of how we operate as a business.

Whilst completing this Modern Slavery Statement for Bluetree Medical we have had to look at ourselves, our supplies and the wider environment in a new light which has highlighted several areas for improvement. As our first Modern Slavery Statement for Bluetree Medical, our initial focus is on building knowledge of the issues surrounding Modern Slavery and establishing a foundation from which to undertake more detailed analysis of our operations and purchasing processes so that we can ensure that slavery and human trafficking are not taking place anywhere in our supply chain.

We are committed to doing the right thing as a business. That includes continuing to build on the foundations laid by the Modern Slavery Act to improve our business processes, policies and risk identification and mitigation.

### Our Supply Chains

Bluetree Design and Print Ltd ensure that all suppliers adhere to the following requirements;

- The Organisation 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.
- The Organisation shall promote gender equality in employment practices, training opportunities, awarding of contracts, processes of engagement and management activities.
- The Organisation 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.
- The Organisation shall pay wages that meet or exceed the legal minimum wages.
- All of the paper and board based packaging is sourced from FSC certified sources.

As a business we use a risk based approach to managing our supply chain based on the latest version of the Global slavery index. This is reviewed when setting up supply chains for new materials and where possible purchased from low risk countries. If this is not possible, suppliers will be reviewed on an annual basis.

### 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 2018 highlights 15 product categories that are at high risk from Modern Slavery. Of these there are only three that impact Bluetree's supply chain which 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. This is an area where there is a potential risk within our supply chain and will need further investigating.
- Ear loops for Surgical masks may fall under the garments category however we are looking at European suppliers for this product.

## **What are we doing to tackle modern slavery?**

Our Team Experience department and management team are responsible for ensuring that we have the right Internal policies and processes in place to proactively tackle modern slavery, such as;

- We have a published recruitment policy which includes a section on 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 having less than 1% of our workforce as agency workers at any time where risk of exploitation and underpaying is in the hands of an external supplier.
- 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 on their first day of work and are given their own personal copy of this to keep and refer back to.
- We are a certified Real Living Wage Employer which means that all our employees are paid the Real Living Wage which is higher than the UK Government's minimum wage.
- 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.
- All employees clock in and out of the business so that we can ensure they are paid fairly for the time they have worked.
- The business has a long-established Grievance policy 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 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.

## **What we will do in the next 12 months to tackle Modern Slavery;**

In the next 12 months we have identified 9 focus areas which will assist us in our continued efforts to tackle modern slavery;

1. We will be expanding our supplier evaluation process to ensure we check our suppliers have a labour standard and a modern slavery policy in place. If they don't have policies in place, a further follow up process will be developed to understand how they operate. In addition, for all new suppliers we will conduct a supplier questionnaire to gain suppliers understanding of their commitment to modern slavery and contractual requirements.
2. We will add a Modern slavery clause to the T&C's on the Purchase Order that we send to suppliers.
3. We will set up a review process for suppliers based on the slavery risk of country as specified in the Global slavery index with all suppliers being reviewed annually as a minimum.

4. For countries identified as high risk on The Global Slavery Index we will aim to conduct an onsite annual audit to assess suppliers or contract an approved Modern Slavery Auditor to perform this audit for us.
5. We will implement a whistleblowing policy.
6. We will examine in detail the supply chain for our electronic equipment and garments preparing a report on the details of Modern Slavery in our existing supply chains and making recommendations for improvements and changes to Bluetree's purchasing processes to reduce the Risk of Modern Slavery in these two areas.
7. We will undertake Modern Slavery Awareness Training for our procurement and project management teams.
8. We aim to set KPI's for our Modern Slavery actions in the following areas:
  - 100% of Bluetree procurement and project management teams trained.
  - Set a minimum score in the Supplier Evaluation Questionnaire that all suppliers must achieve.
  - 50% of suppliers from countries identified as high risk audited in the first year.
  - Report into Electronics and Garments completed by January 2022
9. We will commit to an annual review of our modern slavery requirement that will be discussed at Board level and signed off by the Group Managing Director.

**A closing comment from Adam Carnell, our Managing Director;**

*"Understanding the risks posed by Modern Slavery has been an eye opening experience for myself and the leadership team here at Bluetree Group. Our Modern Slavery Statement for 2021 is an encouraging read, and we are incredibly pleased to see that we are taking action to understand and tackle this issue, we recognise that there are still further areas to investigate and actions that we can take.*

*This statement has generated conversations within the business, opened avenues to investigate and we are now in a position to act further."*

Adam Carnell, Managing Director

March 15th 2021