

Anti-Slavery & Human Trafficking Policy and Statement

Last updated 22/02/2024

1 Introduction

The Company and its subsidiaries, together referred to as "Group", wherever it operates around the world, is committed to conducting business with honesty and integrity; in treating all people with dignity and respect and in complying with applicable laws, regulations, and treaties.

It is also committed to preventing slavery and human trafficking in its business activities and has put in place steps with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains.

The Company maintains relationships with many different organisations in its supply chain, as well as directly employing its own personnel. In the light of the general law on employment and human rights and more specifically, the Modern Slavery Act 2015, the Company is committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chain is free from slavery and human trafficking.

We all have a duty to be alert to risks, however small. Staff members are expected to report their concerns and management to act upon them.

2 Organisational structure and supply chains

This policy covers all the business activities of the Company and its subsidiaries, as a provider of information technology solutions and services across the public and private sector. It governs all our business dealings and the conduct of all persons or organisations with whom the Company contracts with directly or appoints to act on their behalf.

The Company expects all who have, or seek to have, a business relationship with it and/or any member of its Group, to familiarise themselves with the Company's anti-slavery policy and to always act in a way which is consistent with it.

The Group operates globally from offices in London, Texas, and Sydney.

3 Responsibility

The HR department will ensure that risk analysis and investigations/due diligence in relation to modern slavery and human trafficking is carried out as required. HR will also ensure that employees are given adequate and regular training on the issue of modern slavery so that everyone understands and complies with this policy.

The Head of Operations is responsible for the Company's anti-slavery initiatives.

4 Policy and Practices

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The Company's policy on whistleblowing encourages all its workers, customers, and other business partners to report any concerns related to the direct activities of the Company or its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for employees to make disclosures, without fear of retaliation. Employees who have concerns can refer to the [Whistleblowing Policy](#) which is available in the Staff Handbook. The nature of the complaint will determine the Company's next course of action.

The Company endeavors to carry out its own recruitment activities and/or to only use reputable employment agencies to source labor and we carry out appropriate background checks. Personnel responsible for the recruitment activities in any of the subsidiaries are advised to adhere to this policy by ensuring that strict verification of potential employee's right to work is carried out before any offer of employment is made.

The Company expects its subsidiaries and all supply chain to adhere to recruitment practices that ensure that all terms of employment are voluntary. Where necessary and if required, it may request demonstration of compliance with this policy.

5 Awareness & Performance

As well as training employees, the Company will raise awareness of modern slavery issues by emailing the Group's anti-slavery and human trafficking policy to all employees as well as it being made available on the Group's intranet and Staff handbook. It is expected for employees to refer to this policy and understand what is required of them in relation to modern slavery.


The policy will be communicated to all suppliers, contractors, and business partners at appropriate points during the business relationship with them and reinforced as appropriate thereafter.

The Company reserves the right to terminate the relationship with any business partner if cases of non-compliance with this policy are found, or if non-compliance is not addressed in a timely manner.

6 Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

7 Sign-Off

For Bluesource	
Name	Nick Jagers
Position	Head of Operations
Signature	
Date	22/02/2024

8 Revision History

Revision Date	Reviser	Description of Revision
09/07/2019	Nick Jagers	Policy updated and republished
01/03/2020	Nick Jagers	Logo updated and policy republished
22/06/2021	Nick Jagers	Reviewed and no update required
01/03/2022	Nick Jagers	Reviewed and no update required
23/02/2023	Nick Jagers	Reviewed and no update required
22/02/2024	Nick Jagers	Reviewed and rebranded