

Anti-Slavery & Human Trafficking Policy and Statement

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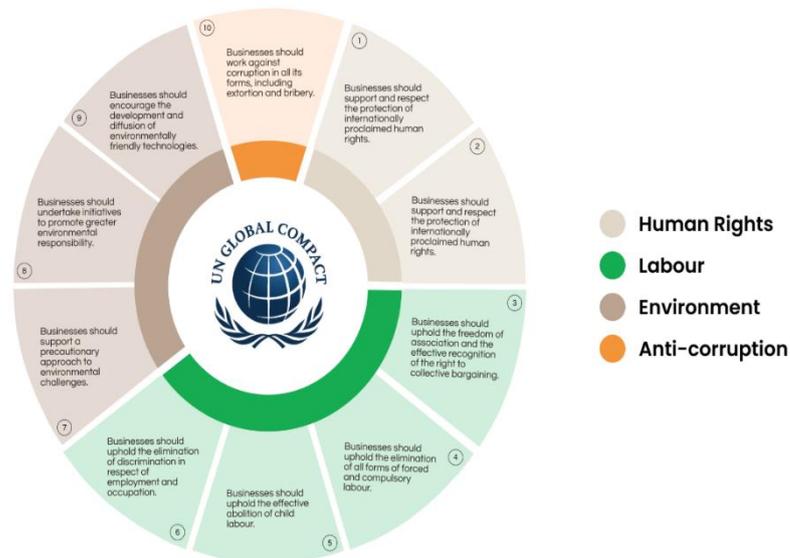
1 Introduction

The Company is committed to carrying out our business sustainably, lawfully, ethically and with integrity no matter where we operate, and in all that we do. We align our principles with the UN Global Compact’s ten principles on human rights, environment, labour and anti-corruption. We integrate our values of responsibility, collaboration, innovation and empowerment in the way we work internally, with partners and customers, both as a team or as individuals.

Whilst modern slavery and human trafficking is not prolific within the industry we operate, and the risk of such practices in our supply chain is low, we have several policies in place to further our commitment to combat modern slavery and human trafficking, which includes:

- This document, our **Anti-Slavery and Human Trafficking Policy**, which outlines the Company’s zero-tolerance to all modern forms of slavery and human trafficking and reflects our commitment to acting ethically and with integrity in all our business relationships.
- Our **Sustainability Policy** which outlines the Company’s approach and alignment with the UN Global Compact’s ten guiding principles, including those most aligned with human trafficking and modern slavery, i.e. its principles related to Human Rights and Labour:

Source: UNGC, n.d.



- Our **Employee Handbook**, which provides guidance to our employees on the standards we expect our employees to follow and adhere to, reflecting our commitment to ensure that modern slavery is not taking place anywhere within our company and in all that we do.

- Our **Supplier Code of Conduct Policy**, which sets out the Company's ethics and provides guidance on the minimum standards of behavior our suppliers must adhere to, reflecting our commitment to implement systems and controls that ensure modern slavery is not taking place within our supply chain. The Supplier Code of Conduct strictly prohibits the use of modern slavery and human trafficking and reconfirms our requirement for relevant third parties to hold themselves and their own relevant suppliers to the same high standards.
- Our **Whistleblowing Policy**, which outlines our commitment to making it possible for employees with serious concerns regarding any aspect of their work, the conduct of others or the running of our organisation to report such concerns in confidence and with confidence. It includes specific reference to concerns relating to modern slavery and human trafficking.

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 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 this policy and the Company's Supplier Code of Conduct Policy, and to always act in a way which is consistent with it.

The Group operates globally from offices in the United Kingdom, United States of America and the Philippines.

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 Operations department, responsible for procurement, will ensure that risk analysis and investigations/due diligence in relation to modern slavery and human trafficking within the supply chain is carried out as required.

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 Employee 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	02/03/2026

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
22/02/2025	Nick Jagers	No changes required
11/02/2026	Nick Jagers	No changes required
02/03/2026	Nick Jagers	Aligned with UN Global Compact