

OVERVIEW

blu-3 (Holdings) Limited and all subsidiary companies are committed to ensuring that there are no acts of slavery or human trafficking within our organisation, or within our supply chains. Our organisation will not support or deal with any business knowingly involved in slavery or human trafficking. The company acknowledges its responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation.

PURPOSE

Supply Chain

Our Modern Slavery policy reflects our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within our supply chain.

As part of our initiative, we have identified that risk areas to our organisation are subcontractors, material, and product suppliers. **To mitigate the risk, the Subcontractor and Supplier assessment procedures and questionnaires have been amended to include questions to establish whether:**

- a) our supply chain has a Modern Slavery Policy.
- b) actions have been, or are planned to be, implemented to ensure there are no acts of slavery or human trafficking within their organisation or their supply chains.

The additional information shall enable blu-3 to evaluate risk to the organisation and make informed decisions when reviewing pre-qualification documents. Since 2016, our organisation has contacted its key supply chain partners to establish what actions they have taken to comply with the Modern Slavery Act. We will actively encourage them to create their own policy or agree to adhere to our policy. All approved supply chain organisations, with an annual turnover of more than 36 million, shall supply a copy of their Modern Slavery Policy.

Training

There are controls within our 'starter procedure' to ensure our workforce is not to be subjected to slavery or human trafficking (poster displayed on sites). To further mitigate risk of slavery and human trafficking within our organisation, training is ongoing informing our managers and senior staff of slavery and human trafficking, its impact on our society, what to look out for and our organisation's reporting protocol.

This policy statement is made pursuant to sections (1) (4) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending April 2019 and shall be published on the organisations website in accordance with section (7) (a) of the Modern Slavery Act 2015.

The company Directors shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains. This policy statement will be reviewed annually by the Finance Director to ensure its continuing suitability and relevance to the company and its activities.

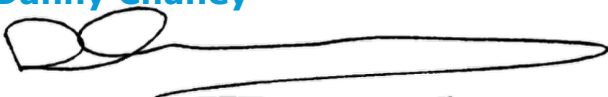
DEFINITIONS

N/A

PROCEDURE/PROCESSES

Supporting procedures/processes are available on SharePoint; contained within the Procedure & Process section of the IMS.

Danny Chaney



Chairman