

## OVERVIEW

### Opening Statement from Senior Management

**blu-3 (Holdings) Ltd and all subsidiary companies are committed to zero tolerance of 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 and / or human trafficking. The company acknowledges its responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation.**

## PURPOSE

### Structure of the Organisation

blu-3 (Holdings) Ltd is a fully integrated infrastructure provider delivering expertise to the UK and Europe's largest construction projects. Across the Group, blu-3 (Holdings) Ltd employs 150 people with business operations in the UK, Ireland, Netherlands, Austria, Germany, and Spain. As at year end March 2024, the Group has an annual turnover of £121million. To find out more about the nature of our business, please visit: <https://www.blu-3.co.uk/>. In order to provide the full spectrum of our services, we work with a range of suppliers which includes subcontractors, material, and product suppliers. 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.

### Managing our Supply Chain

As part of our efforts to monitor and reduce the risk of slavery and / or human trafficking occurring within our supply chains, we have the following due diligence procedures:

- Comprehensive Subcontractor and Supplier Assessment procedures
- Obtaining copies of Modern Slavery Policies from suppliers with a turnover of £36million and over
- Reviewing measures to prevent acts of slavery and human trafficking within their own business and supply chains
- Specific pre-qualification questions to evaluate risk of slavery and /or human trafficking

Additionally, we make sure our supply chain and anyone who represents blu-3 is aware of our own stringent policies and agree adherence to our high standards.

### Risk Assessment

After careful review of our activities, the following areas were identified of being at high risk of slavery or human trafficking and therefore have relevant controls in place to mitigate risks.

- **Employment:** we conduct thorough right to work checks in accordance with operating country requirements to ensure every employee has the legal and ongoing right to work. All new recruits are reference checked to verify previous employment history. All employees are paid into a bank account in their own name to further mitigate any risks and prevent forced labour
- **Policies:** our policies are held on an internal SharePoint system and responsibility for reviewing and updating sits with Department Heads. Internal Audits are conducted by our Compliance Team to ensure accuracy, relevance, and compliance
- **Formal Conduct Management:** the company Disciplinary Policy is owned by the People & Culture Team and covers the process for both misconduct and gross misconduct in accordance with Acas

guidance. Suspected instances of slavery and / or human trafficking would be investigated in accordance with this policy

- **Whistleblowing:** our Whistleblowing Policy is accessible to all employees and details the process to follow to report conduct that is dangerous, against the law, or breaches ethical or professional codes. This policy covers the actions of employees, workers, suppliers, service providers and clients, and outlines the process to follow to report wrongdoing or concerns

## Training

As part of the new starter process, employees are shown where to find our policies and the selection available. Through employment, we invest in educating our people through the provision of purchased learning content available on our learning platform, Wayfinder (Thrive). Modern Slavery is detailed as a mandatory course for all employees; new starters complete this within their first 30 days of employment.

Following our review of our actions this financial year to prevent slavery and / or human trafficking from occurring in our business and supply chains, we continue to list Modern Slavery as an annual refresher course for all employees.

## Sign off

This policy statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes blu-3 (Holdings) Ltd's slavery and human trafficking statement for the financial year commencing April 2025 and ending March 2026 and shall be published on the organisations website in accordance with the Act.

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 Head of People & Culture 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.***



**Ramnik Kapur**  
**Chief Financial Officer**