

MODERN SLAVERY & HUMAN TRAFFICKING POLICY STATEMENT

Bluestone Design & Construction Ltd is fully committed to the eradication of modern-day slavery and human trafficking, both within its operations and throughout its supply chain, including sub-contractors and business partners.

Compliance with the Modern Slavery Act 2015

Bluestone Design & Construction Ltd acknowledges its responsibilities under the Modern Slavery Act 2015. Bluestone is dedicated to promoting transparency in all aspects of its business and supply chains. This transparency will extend to all suppliers of goods and services, ensuring that all parties involved adhere to ethical practices.

Supply Chain Transparency and Due Diligence

Bluestone's supply chain includes a wide variety of suppliers providing both goods and services. As part of the supplier approval process, Bluestone will conduct thorough reviews of the suppliers' internal controls concerning modern slavery and human trafficking.

- Risk management: Suppliers, particularly those importing goods from outside the UK and EU, are considered to pose a higher risk for slavery and human trafficking. Bluestone will apply strict management oversight to these high-risk suppliers and will continually monitor their practices to mitigate risk.
- Non-compliance: Bluestone will not engage with any business that is known to be involved in modern slavery or human trafficking.

Accountability and Resource Allocation

The Directors bear ultimate responsibility for ensuring that the objectives of this policy are met. They are tasked with allocating adequate resources to eliminate any potential issues related to modern slavery and human trafficking within the company and its supply chain.

Employee Access and Communication

- All employees will have access to a copy of the Modern Slavery Act 2015, which can also be requested through the HR department.
- Formal procedures have been established to address any breaches of this policy, including the imposition of **disciplinary measures** where necessary.

Annual Review and Continuous Improvement

This policy will be reviewed annually to ensure its relevance and suitability to the company's operations. The policy is part of Bluestone Design & Construction Ltd's **Integrated Management System (IMS)**, which complies with the standards of **ISO 9001:2015, ISO 14001:2015, and OHSAS 18001:2007**. The IMS emphasizes the company's commitment to maintaining high standards of ethical and responsible business practices.

Training and Awareness

To ensure compliance, the company will provide ongoing **training** to all employees, ensuring that the policy is well understood and effectively implemented across all levels of the organization. Regular reviews will be conducted by the Directors to guarantee that the policy remains fit for purpose.

Conclusion

Bluestone Design & Construction Ltd remains steadfast in its efforts to combat modern slavery and human trafficking. The company aims to foster a culture of responsibility and transparency, aligning its business practices with its commitment to ethical standards.

This policy is effective immediately and will be updated annually.

Bluestone Design & Construction Ltd is committed to driving out acts of modern day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

These as well as the suppliers of services make up the supply chain within Bluestone Design & Construction Ltd.

As part of the companies due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored. The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A copy of the Modern Slavery Act 2015 will be accessible to all employees electronically and can be obtained from the HR department upon request.

This policy statement will be reviewed annually and published.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO 9001:2015, ISO 14001:2015 and OHSAS 18001:2007. The implementation and operation of this management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.



R.L. Molyneux
Director



L.R. Medforth
Director

1 April 2025