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**Last Reviewed: March 2025**

**Next Review Due: March 2026**

## **Modern Slavery Act Compliance Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 October 2024. This Statement has been approved by the Board of Directors of Bluestones Investment Group Limited (Bluestones).

Operating primarily in the UK, Bluestones employs over 394 people across 29 locations. Bluestones is a human capital investment company, with the subsidiary businesses within its portfolio being made up of recruitment businesses, staffing service companies and related workforce solutions providers.

References to the Bluestones Group mean Bluestones and its subsidiary companies. Further information about the Bluestones Group and information on our subsidiary companies is available on the Group website **HERE**.

This statement applies to the Bluestones Group and its subsidiary companies.

## **Modern Slavery Statement**

The Bluestones Group does not believe there is any place in today's world for slavery and human trafficking and in making this statement commits to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our businesses.

We are committed to evolving our practices through all our group companies to combat slavery and human trafficking and to encourage the same principles and standards from our supply chain and business partners.

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No breaches of the Modern Slavery Act 2015 were reported in the Bluestones Group in FY 2024 or have been previously.

The ways in which the Bluestones Group are minimising the risks of modern slavery are details below.

### **Our Supply Chain**

The Bluestones Group takes its responsibility for ensuring the risk of modern slavery and human trafficking is minimised across its supply chain. It achieves this through a combination of supplier due diligence questionnaires and annual supplier audits. The Group expects its staff to report concerns of non-compliance, no matter how trivial, in line with the established policies and procedures.

### **Due diligence processes**

In order to identify and mitigate the risks associated with modern slavery and human trafficking, the Bluestones Group has adopted the following processes:

1. We review our supplier appraisal questionnaires on an annual basis to ensure continued compliance. Ensuring the questionnaire includes unambiguous questions regarding a supplier's compliance (with modern slavery and human trafficking legislation) and their policies and processes)
2. We conduct internal audits on our recruitment process (and those of our subsidiaries) to ensure that we only engage eligible workers for agency work.
3. We expect the suppliers we work with to have anti-slavery and human trafficking policies and processes that cover the subsequent relationships with their suppliers as it is not practical for us to influence and have a direct relationship with all levels of the supply chain.

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## Risk assessment

With many of the subsidiary companies within the Bluestones Group placing personnel into companies on a temporary, contract or permanent basis, we appreciate the importance of robust operational practices. Through the aforementioned due diligence processes, supplier audits and questionnaires, and internal policies and staff training, we act to minimise the risk of individuals being placed into any form of slavery.

Checks are also undertaken to verify and identify where agency workers may be sharing bank accounts, addresses and telephone numbers which may be a risk indicator.

Bluestones will continue to assess the risks associated with modern slavery and human trafficking and aim to fully understand other indicators of modern slavery.

## Measuring effectiveness

Through regular monitoring, audits and assessments we measure the effectiveness of our risk control measures to ensure that slavery and human trafficking is not taking place in our business, our subsidiary businesses or our supply chains.

Our key performance indicators (KPIs) in this instance are:

- 100% compliance of supply chain companies via the supply chain audit process.
- 100% pass rate when reviewing recruitment activities and their compliance with agreed modern slavery processes.

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## Policies on modern slavery

Bluestones Investment Group has a clearly defined Modern Slavery Policy, which can be read in full in this policies section of the website. This policy is regularly updated to reflect best practice methodologies.

Our Modern Slavery Policy reflects the Company's commitment to acting with integrity in all its relationships and has implemented adequate policies, procedures and systems to ensure that slavery and human trafficking is not taking place.

## Training for staff

With such a clear focus on maintaining 100% compliance with modern slavery and human trafficking legislation it is essential that the people within our business receive adequate training and information. We provide information on this legislation and our policies and processes via the Group's Intranet system and through induction and training updates.

Employees, workers, business partners and customers are encouraged to report any concerns that may give rise to a risk of modern slavery or human trafficking. The Group's Whistleblowing Policy is designed to make it easy for disclosures to be made without fear of retaliation. The Group's Legal & HR Director, a practising solicitor, is the Whistleblowing Officer. In circumstances which prevent independent consideration of disclosures internally the Company's auditors or external solicitors will be instructed.

Employees are advised on how to report any concerns they have associated with modern slavery and trafficking.

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