

Modern Slavery Policy

Effective Date: 02/03/2025

Review Date: 28/02/2026

Approved by: Board of Directors

1. Purpose and Commitment

The Blue Group is a defence contractor with operations spanning Europe, Asia, Africa, and the Americas. Our products, which range from conventional weapons and munitions to specialised logistics services, are supplied to both government and commercial end users.

We recognise that modern slavery, including forced labour, human trafficking, bonded labour and child labour, is a systemic and global issue that can affect all sectors, including defence. We are committed to preventing these abuses in any part of our business or supply chain and to working only with partners who share this commitment.

This policy sets out our principles, the policies that support them, and the procedures we use to ensure our operations and sourcing activities uphold the dignity, safety and freedom of all workers.

2. Our Approach

We believe that preventing modern slavery is not achieved through one policy or process, but through a culture of responsibility, supported by governance structures, ongoing training, supplier engagement, and meaningful due diligence. Prevention is woven into how we source, how we recruit, and how we engage with our staff and suppliers.

3. Policies and Practices Supporting Our Commitment

Our approach to modern slavery prevention is embedded in a range of operational policies and procedures that govern how we do business:

Supplier Code of Conduct

Our Supplier Code of Conduct outlines the ethical and labour standards we expect of all suppliers, agents, and subcontractors. It explicitly prohibits the use of forced or child labour, sets expectations on working conditions, wages and hours, and requires freedom of movement and association for all workers. It is a condition of doing business with us.

Migrant Worker Policy

We recognise that migrant workers, particularly in certain regions, may be at heightened risk of exploitation. Our policy prohibits recruitment fees, retention of passports, or tied accommodation schemes. We engage only with licensed, ethical recruitment providers and regularly check labour sourcing practices in at-risk jurisdictions.

Child Labour Policy

We prohibit all forms of child labour in line with ILO Conventions 138 and 182. We require suppliers to verify the age of workers at hiring and maintain appropriate records. Where family-run enterprises or informal sectors are involved, we conduct further checks to ensure young persons are not exposed to hazardous work or prevented from completing compulsory education.

Human Rights Policy

Our Human Rights Policy reinforces our commitment to the UN Guiding Principles on Business and Human Rights. It ensures that respect for human dignity, non-discrimination, and fair treatment is part of all business decisions, from procurement through to personnel management and logistics operations.

Recruitment Policy

We ensure that all recruitment – whether direct, through agencies, or through international hiring – is conducted transparently and ethically. We require employment contracts to be in a language the employee understands, prohibit deceptive terms, and conduct pre-engagement checks on third-party labour providers.

Procurement Policy

Our procurement procedures include modern slavery as part of risk assessments, especially in relation to country of origin, product type, and production process. Suppliers are required to complete detailed onboarding forms, accept our Code of Conduct, and may be subject to audit at any time.

Employee Code of Conduct

This outlines expected behaviour for all employees and subcontractors. It includes clear obligations to report any concerns related to labour practices, discrimination, or unethical supplier conduct. Breaches can result in disciplinary action, including dismissal or contract termination.

Access to Remedy and Victim Support Policy

Where modern slavery or exploitation is identified, we are committed to providing or facilitating access to remedy. This may include supporting legal claims, coordinating with NGOs, ensuring back-pay or safe return, and terminating relationships with non-compliant suppliers. We do not “walk away” where doing so would worsen conditions for affected individuals.

Training and Awareness Policy

We provide training on identifying and preventing modern slavery to all staff. Refresher training is delivered annually, and materials are updated to reflect emerging risks and sector guidance.

Worker Wages, Welfare and Living Standards Policy

We ensure that everyone working in our operations or those of our suppliers is paid at least the legal minimum wage (or living wage, where local laws are inadequate), is provided with safe and sanitary working conditions, and is not subject to unlawful deductions. Suppliers must assure that meet these requirements during onboarding and renewal.

4. Operational Risk and Sector Exposure

As a defence contractor, our supply chain includes:

- Manufacturers of conventional arms, ammunition, munitions, optics and electronics
- Chemical and propellant suppliers
- Freight handlers and cross-border logistics providers
- Industrial packaging and warehousing services
- Labour-intensive subcontracting in machining, assembly, or inspection

We recognise that risk is not confined to Tier 1 suppliers. Our due diligence extends to subcontracted manufacturers, labour providers, and facilities in high-risk sectors or countries.

5. Governance and Oversight

The Board of Directors has ultimate responsibility for the implementation and oversight of this policy. Operational accountability lies with the Compliance Manager, who reports quarterly on risk assessments, audit findings, and policy performance. Functional leads in procurement, legal, HR and operations are required to embed anti-slavery controls in their areas.

6. Communication and Engagement

- This policy is published internally and externally and forms part of supplier onboarding documentation.
- All new employees receive training during induction, and annual refreshers are provided to ensure continued awareness.
- All high-risk suppliers must confirm adherence to our standards and may be required to undertake further compliance steps.

We also engage with external stakeholders to align our approach with best practices in the defence sector.

7. Reporting and Whistleblowing

We maintain an independent whistleblowing line and secure reporting email address. Concerns raised by employees, suppliers, or third parties are investigated swiftly and confidentially. Where credible allegations arise, we act decisively to protect individuals and address systemic issues.

If you are a worker, supplier, or third party and suspect modern slavery or exploitation in any part of our operations or supply chain, you can report it confidentially to us directly or through the Modern Slavery Helpline at 08000 121 700 or report@modernslaveryhelpline.org. Reports are free, anonymous, and available 24/7.

8. Monitoring and Review

We annually review our policy and approach to modern slavery in light of:

- Audit findings
- Supplier compliance trends
- External developments
- Feedback from stakeholders

Annual reviews are documented and material updates are published in our Modern Slavery Statement, which is available on our website in accordance with Section 54 of the Modern Slavery Act 2015.