

## **MODERN SLAVERY ACT STATEMENT**

BlueCrest is committed to the highest standards of product quality and business integrity in its dealings with Suppliers and ensuring that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally and socially responsible.

This statement further sets out the steps we are taking to combat slavery and human trafficking.

## **ORGANISATION'S STRUCTURE**

DMT Solutions Global Corporation d/b/a BlueCrest is the global market leader in enterprise print, mail, and customer communications solutions. BlueCrest has its head office in the United States of America. The BlueCrest Group has approximately 1,400 employees worldwide in direct operations in 18 countries, and operates through partners in many other territories. The Group has a global annual turnover of over US\$ 430 million.

The BlueCrest organization in the UK consists of DMT Solutions U.K. Limited with its branches in Ireland, Switzerland and Denmark.

## **OUR SUPPLY CHAINS AND DISTRIBUTION CHANNEL**

Our supply chain and distribution channel includes:

- Procurement of thousands of products, parts, supplies and services from suppliers located in multiple geographies (including The Americas, Europe, Asia and ANZ);
- Warehousing and distribution from strategically located, third party facilities in North America and Europe and
- On-line sales channels, a direct sales and service force, and third party channels, retained to distribute and resell products and services.

## **OUR APPROACH TO PREVENTING SLAVERY AND HUMAN TRAFFICKING**

We are committed to maintaining business operations, including our supply chain, that do not use or rely on modern slavery or human trafficking; to acting ethically and with integrity; and to

implementing and enforcing effective systems and controls in an effort to prevent slavery and human trafficking in our supply chains.

### **Employee Accountability Standards:**

BlueCrest's internal accountability standards for employees are found in our Code of Conduct, our human resources policies and local rule of law. BlueCrest opposes the use of forced labor or the unlawful employment of children in any place where we do business, or by any contractor, agent or supplier with whom we do business.

Subject to the provisions or requirements of local law, and after due diligence and full and fair investigation, any BlueCrest Group employee found to have engaged in slave labor or human trafficking will be subject to immediate termination of employment.

### **Supply Chain Accountability Standards:**

- **Supplier Selection:** As part of our initiative to identify and mitigate risk BlueCrest's Supply Chain and Procurement functions engage in verifications of suppliers to evaluate and address risks of human trafficking and slavery in the supplier's quality, environmental, human resources and security standards and operations. These verifications are conducted in connection with BlueCrest's pre-contract due diligence and evaluation process as further detailed in the section below on "Risk-based assessments and audits". Once approved the supplier must contractually commit to meeting the standards set by BlueCrest or be subject to restrictions or termination of their contractual relationship with us. Key suppliers are also subject, through contractual provisions preserving audit rights for BlueCrest and any third-party reviewer retained by BlueCrest, to a review of their facilities. We currently do not conduct any verification regarding whether our suppliers use labor brokers.

- **Supplier Code of Conduct:** All of our strategic suppliers are required to acknowledge and adhere to a Supplier Code of Conduct, to seek to conform to its standards and provisions and to apply the Code to their suppliers engaged in the production of goods for the BlueCrest Group. As stated in our Code we require that, as a condition of doing business with us, suppliers:

- agree not to engage in any form of human trafficking or slavery. BlueCrest has given suppliers examples of good management practices for evaluating and addressing risks of human trafficking in their own supply chain including not using forced or involuntary labor of any type or illegal child labor. All employment must be voluntary and legal.

- comply with all applicable wage and hour laws and regulations including those relating to minimum wages, overtime hours, piece rates and other elements of compensation and provide legally mandated benefits.

- treat all employees with respect and not use corporal punishment, threats of violence or other forms of physical coercion or harassment. Every supplier should have a policy that prohibits inappropriate conduct and a process for employees to report such conduct for supplier's investigation and resolution.

- Risk-based assessments and audits: BlueCrest in its discretion expressly reserves the right to verify a supplier's compliance with the Code through audits or on-site inspections including interviews of the supplier's employees in order to evaluate supplier's compliance with BlueCrest's standards for trafficking and slavery in supply chains and other BlueCrest supplier standards. Such audits or inspections can be carried out by BlueCrest or by a third party at BlueCrest's request.
- Whistle-blowing: Since its formation BlueCrest has sponsored an Ethics Help Line to make inquiries and report concerns about potential violations of Company policy or the law. The Ethics Help Line is available in many languages, toll-free, 24 hours a day, seven days a week for callers to submit their concerns anonymously (if they so choose) and without fear of retaliation.

### TRAINING

To better sensitize our supply chain employees to the risks of modern slavery and human trafficking in our supply chains and our business, we continue to provide live training to that staff. All BlueCrest employees receive training on our Code of Conduct which requires their compliance with law and BlueCrest policy on a periodic basis. Both management and non-management employees in our Supply Chain and Procurement functions will periodically receive refresher training on human trafficking and slavery risk mitigation and avoidance.

BlueCrest is committed to the highest standards of conduct throughout our supply chain. On a regular basis we review and update our policies and procedures to ensure that our high standards are upheld and to guard against the mistreatment of anyone in our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the year ending 31 December 2019.

This statement was approved by the Board of DMT Solutions U.K. Limited.

  
Mary Ann Sigler, Director  
Date: \_\_\_\_\_