



Modern Slavery
Statement
2019 FY





1) Statement

This statement is made on behalf of BlueCat Networks, Inc. and its subsidiaries, including BlueCat Networks Europe Limited (together “BlueCat”) pursuant to section 54(1) of the Modern Slavery Act 2015 (“MSA”). BlueCat is a global DDI solutions software developer. Founded in 2001, BlueCat today develops and distributes a range of DDI products, services, and solutions worldwide. This statement has been prepared by BlueCat in relation to the MSA and relates to actions and activities during the financial year 1 April 2018 to 31 March 2019.

2) Commitment

BlueCat is committed to ensuring that there is no slavery, servitude, forced or compulsory human labour, abuse of power over vulnerable individuals, human trafficking or any other form of exploitation as contemplated by the MSA in any part of our business or in our supply chain. BlueCat welcomes the transparency encouraged by the MSA and this statement sets out for the public, BlueCat’s clients, suppliers and employees, the steps that are being taken in this regard by BlueCat.

3) BlueCat’s Internal Initiatives

BlueCat strives to be transparent and accountable in all commercial endeavors. As an organization, BlueCat is committed to meeting any social, ethical or legal standards, which will ultimately benefit BlueCat’s customers, employees, and the community at large.

BlueCat takes an active approach to its corporate responsibility. For example, at the point of recruitment, appropriate checks in accordance with relevant laws are carried out on prospective employees and our People Team works closely with the relevant teams in the local territories to make sure that compensation, holidays, pay and conditions are appropriately managed and within the legal and societal norms in our various territories around the world.

4) BlueCat’s Supply Chain Initiatives

Additionally, in accordance with BlueCat’s commitment to acting ethically and with integrity in all our business relationships, BlueCat is currently implementing a more rigorous Supply Chain/ Procurement procedure. All contractors are to comply with relevant laws and applicable BlueCat policies and procedures, which give a clear view of the values and principles that underpin all of the work of BlueCat and what is expected of all persons involved in BlueCat’s business and supply chains. Furthermore, if during the supply chain vetting process, it is discovered that additional measures are required with a certain vendor, that will help influence BlueCat’s decisions if i) to include that vendor in BlueCat’s supply chain, and ii) whether further contractual protections are required in BlueCat’s agreements with those suppliers to manage any perceived risk of Modern Slavery.

5) Moving Forward

Modern slavery is a complex challenge that cannot be solved overnight. BlueCat’s efforts to combat these practices are ongoing, evolving, and continually improving.

This statement was reviewed by relevant internal teams and approved by BlueCat’s Chief Financial Officer and Director, Stephen Devito.