

**TRANSPARENCY STATEMENT ON ANTI-  
SLAVERY AND HUMAN TRAFFICKING**

## 1. Purpose

- 1.1. Corporate Document Services Limited ('CDS'), a member of the Bailie Group (the 'Group') is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

## 2. Scope

- 2.1. This is the CDS annual published Group Policy Statement, which is our stance on anti-slavery and human trafficking.
- 2.2. This Policy Statement applies to our financial year ending 31 December 2023 and applies to all our employees at all levels, agents, contractors, external consultants, third-party representatives and business partners and suppliers pursuant to section 54 of the Modern Slavery Act 2015 (the 'Act').

## 3. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We are committed to ensuring there is transparency within CDS and the Group and to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act. We expect the same high standards from all our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. Our employees are also aware of their obligations under the Act, and our support for them if they suspect any conflict or a breach of the Act.

## 4. Responsibility for this Policy Statement

- 4.1. The Managing Director of CDS has overall responsibility for ensuring this Policy Statement complies with our legal and ethical obligations, and that all those under our control comply with it.
- 4.2. The Bailie Group Head of People has primary and day-to-day responsibility for implementing this policy internally, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 4.3. Management at all levels within CDS are responsible for ensuring those reporting to them understand and comply with this Policy Statement and are given adequate and regular training on it and the issue of modern slavery in supply chains.

## 5. Steps Taken by CDS to Comply with the Act

### 5.1. Risk Assessment

- 5.1.1. CDS has risk assessed its vulnerability to human rights abuses, our overall risk rating is low. The assessment is based on country, employment type and industry. Following the risk assessment, we have determined that the areas of our business where risks of

modern slavery are higher in our supply chains within our contractor and agency employment types.

## 5.2. Supplier Due Diligence

5.2.1. Our supply chain is subject to annual assessment of modern slavery risks through our due diligence procedures. The assessment is carried out on all suppliers. We set an ambitious target of 100% completion for new suppliers and existing suppliers with annual turnover >£10k in 2023. Progress against this KPI for existing suppliers has been slower than expected, with 82% completed or in progress.

## 5.3. Employee Training and Compliance with this Policy Statement

5.3.1. Our employees are trained on our obligations under the Act, and on our policy. They are aware of the risk our business faces from modern slavery in its supply chains. Training forms part of the induction process for all individuals who work for us, and refresher training is now provided on an annual basis through our annual online employee learning programme.

## 5.4. Employee Access and Compliance with this Policy Statement

5.4.1. Our employees have easy access to our internal Policy on Anti-Slavery and Human Trafficking, via our corporate intranet. Our employees are invited to comment on it and suggest ways in which it might be improved via the Group Head of People.

5.4.2. Our employees also have access to an internal Policy and this Policy Statement which appears on the CDS & Group website/s.

5.4.3. We encourage and support our employees in reporting suspicious activity and as such, have developed a new modern slavery incident reporting procedure to enable our teams to recognize any incidents of modern slavery and report them appropriately.

## 5.5. Consequences for Employee Breaches of this Policy Statement

5.5.1. Any employee who breaches the policy faces disciplinary action, which could result in dismissal for misconduct or gross misconduct.

## 5.6. Suppliers Compliance with this Policy Statement

5.6.1. Our Head of Strategic Sourcing is responsible for CDS' commitment to addressing the issue of modern slavery in our business and supply chains, it is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5.6.2. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. Our suppliers must in turn withhold their own suppliers to the same high standards.

5.6.3. In our standard supplier agreement templates, we have included modern slavery and human trafficking warranties and undertakings, which we continue to review and will strengthen where necessary. Pursuant to these terms, we make it incumbent upon our suppliers to respect and comply with all applicable laws, including the Act. In these, we also reserve the right to terminate our commercial partnership with any supplier who is found to be in breach of, or who fails to comply with the Act. This applies to both domestic and international suppliers contracting with us.

## 5.7. Consequences for Suppliers who breach this Policy Statement

5.7.1. We may terminate our relationship with individuals and organisations working on our behalf if they breach their obligations under the Act.

## 6. Goals and Key Performance Indicators (KPI's)

6.1. Our progress towards goals and our modern slavery KPI's for the next financial year are as highlighted in the following table:

### 2023

Goal	Progress (2022)	KPI (2023)
Ensure modern slavery risks are being assessed in our supply chain.	We have conducted a full review of our supplier assessments to ensure modern slavery is being assessed within our procurement lifecycle.	100% supplier completion target for new suppliers and existing suppliers with annual turnover >£10k
Enhance modern slavery training and awareness for CDS employees	We have released a new modern slavery training module into our annual training schedule.	>85% completion rate of internal modern slavery e-module
Improve supplier awareness of CDS modern slavery policies and procedures	Include modern slavery statement and related codes in our annual supplier assessment.	Yes / No

### 2024

Goal	Progress (2023)	KPI (2024)
Ensure modern slavery risks are being assessed in our supply chain.	100% for new suppliers. For existing: 35.33% completed. 46.67% in progress.	100% supplier completion target for new and existing suppliers.
Enhance modern slavery training and awareness for CDS employees.	85.82% completion in 2023.	>90% completion rate of internal modern slavery e-module.
Improve supplier awareness of CDS modern slavery policies and procedures	Additional modern slavery information added to annual assessment for supply chain.	N/A
Improve Modern Slavery Assessment Tool (MSAT) risk score.	Most recent risk rating at 80%, implement 5 improvement actions to improve overall risk rating.	85%

## 7. Document Owner & Approval

7.1. The Bailie Group Chief Executive Officer, alongside the Managing Director of CDS is the owner of this document and is responsible for ensuring that this Policy Statement is reviewed in line with the review requirements stated above or at least annually.

7.2. This Policy Statement was approved by and is issued on a version-controlled basis under the signature of the Managing Director of CDS.

Signature



Date

23 / 05 / 2024