



COMP-POL-46

**BAILIE GROUP  
POLICY STATEMENT ON  
ANTI-SLAVERY & HUMAN TRAFFICKING**

**PUBLIC CLASSIFICATION**

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## 2. Purpose

- 2.1. 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.

## 3. Scope

- 3.1. This is the Group's annual published Group Policy Statement, which is our stance on anti-slavery and human trafficking.
- 3.2. This Policy Statement relates to Bailie Group's financial year ending 31 December 2022, and is applicable for 2023. It is updated annually each year, in accordance with the Modern Slavery Act 2015 (the 'Act').
- 3.3. This Policy 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 'Act'.

## 4. Bailie Group Structure

- 4.1. The Group subsidiaries are:
  - Corporate Document Services Limited ('CDS') Riverside House, 7 Canal Wharf, Leeds, England, LS11 5AS
  - CDS Support Limited ('CDS Defence & Security') The Bramery, Alstone Lane, Cheltenham, England, GL51 8HE
  - Newspress Limited ('Newspress') Riverside House, 7 Canal Wharf, Leeds, England, LS11 5AS

## 5. Policy Statement

- 5.1. 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 the Group and to tackling modern slavery throughout our supply chains, consistent with our 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.

## 6. Responsibility for this Policy Statement

- 6.1. Bailie Group Board of Directors has overall responsibility for ensuring this Policy Statement complies with our legal and ethical obligations, that all those under our

control comply with it, and that any operating Companies that are in scope of the Act comply.

- 6.2. The Bailie Group Head of People has primary and day-to-day responsibility for implementing this policy, 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.
- 6.3. Management at all levels within the Bailie Group, 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.

## 7. Steps Taken by the Bailie Group to Comply with the Act

### 7.1. Risk Assessment

- 7.1.1. The Group 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 is our supply chains within our contractor and agency employment types.

### 7.2. Supplier Due Diligence

- 7.2.1. Our supply chain is subject to assessment of modern slavery risks through our due diligence procedures. The assessment is carried out on all suppliers.

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

- 7.3.1. 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 on this forms part of the induction process for all individuals who work for us, and regular refresher training is provided as necessary.

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

- 7.4.1. 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.
- 7.4.2. Our employees also have access to this Policy Statement which appears on the Group website.
- 7.4.3. We encourage and support our employees in reporting suspicious activity.

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

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

### 7.6. Suppliers Compliance with this Policy Statement

- 7.6.1. Our commitment to addressing the issue of modern slavery in our business and supply chains is also communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

- 7.6.2. 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 hold their own suppliers to the same high standards.
- 7.6.3. 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.

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

- 7.8. We may terminate our relationship with individuals and organisations working on our behalf if they breach their obligations under the Act or are unable to demonstrate adequate compliance.

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

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

Goal	Progress	KPI's (2023)
Ensure modern slavery risks are being assessed in our supply chain.	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	

## 9. Document Owner & Approval

- 9.1. The Bailie Group Chief Operating Officer, as the Senior Risk Officer, 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.
- 9.2. This Policy Statement was approved by and is issued on a version-controlled basis under the signature of the Chief Executive Officer.

Signature \_\_\_\_\_  
Date \_\_\_\_\_

## 10. Document Control

Owner	Phil Walters
Author	Jorja-Leigh Knight
Version	3.0
Last Review Date	18 April 2023
Internal Classification	No: Public

## 11. Version history

Version	Date change of	Description of change	Change By	Approved By
0.1	24 July 2019	Draft	COO	COO
1.0	1 March 2020	First Issue to reflect appointment of Head of People	COO	COO
2.0	April 2022	Annual Update	LC	COO
3.0	18 April 2023	Annual Update	Jorja-Leigh Knight	COO

Standard/Legislation	Reference(s)
Modern Slavery Act 2015	The 'Act'