



COMP-POL-46

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

PUBLIC CLASSIFICATION

1. Purpose

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

This is the Group’s annual published Group Policy Statement, which is our stance on anti-slavery and human trafficking.

This Policy Statement relates to Bailie Group’s financial year ending 31 December 2023, and is applicable for 2024. It is updated annually each year, in accordance with the Modern Slavery Act 2015 (the ‘Act’).

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 Modern Slavery Act 2015 (the ‘Act’)

3. Bailie Group Structure

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

4. 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 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.

5. Responsibility for this Policy Statement

Bailie Group Board of Directors has overall responsibility for ensuring this Policy Statement complies with our legal and ethical obligations, and that any operating companies in scope of the act comply.

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.

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.

6. Steps Taken by the Bailie Group to Comply with the Act

Risk Assessment

CDS has risk assessed its vulnerability to human rights abuses, their overall risk rating is low. The assessment is based on country, employment type and industry. Following the risk assessment. The areas of our business where risks of modern slavery are higher is our supply chains within our contractor and agency employment types.

Supplier Due Diligence

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

Employee Training and Compliance with this Policy Statement

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.

Employee Access and Compliance with this Policy Statement

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.

Our employees also have access to this Policy Statement which appears on the Group website.

We encourage and support our employees in reporting suspicious activity.

Consequences for Employee Breaches of this Policy |Statement

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

Suppliers Compliance with this Policy Statement

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

As part of CDS 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. Their suppliers must in turn hold their own suppliers to the same high standards.

In CDS standard supplier agreement templates, modern slavery and human trafficking warranties and undertakings are included, which are reviewed and strengthened where necessary. Pursuant to these terms, it is made incumbent upon CDS 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 CDS.

The Group is strengthening its supplier management across all of its operating companies.

Consequences for Suppliers who breach this Policy Statement

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.

7. 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:

2023

Goal	Progress (2022)	KPI (2023)
Ensure modern slavery risks are being assessed in our supply chain.	CDS conducted a full review of supplier assessments to ensure modern slavery is being assessed within procurement lifecycle.	100% supplier completion target for new suppliers and existing suppliers with annual turnover >£10k
Enhance modern slavery training and awareness for 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 CDS annual supplier assessment.	Yes /no

2024

Goal	Progress (2023)	KPI (2024)
Ensure modern slavery risks are being assessed in CDS supply chain.	100% for new CDS suppliers. For existing: 35.33% completed. 46.67% in progress.	100% supplier completion target for new and existing suppliers within CDS.
Enhance modern slavery training and awareness for all 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 CDS annual assessment for supply chain.	N/A
Complete Modern Slavery Assessment Tool (MSAT) risk score for the "Group"	New goal	Completion of MSAT to assess overall risk for "the group"

8. Document Owner & Approval

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.

This Policy Statement was approved by and is issued on a version-controlled basis under the signature of the Chief Executive Officer.

Signature _____
Date _____

9. Document Control

Owner	Kieran Eblett
Author	Jorja-Leigh Knight
Version	4.0
Last Review Date	10/06/2024
Internal Classification	Public

10. Version history

Version	Date of change	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
4.0	10 June 2024	Annual Update	Katie McShera	Jorja Leigh-Knight

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