

Modern Slavery Statement 2026

1. Purpose, governance and continuous improvement

1.1. Corporate Document Services Ltd ('CDS'), is committed to acting ethically and with integrity in all our business dealings. As a responsible business, we recognise that combatting modern slavery is a perpetual obligation.

As a business focused on delivering **Outcomes That Matter** for our clients, we believe those outcomes can only be achieved by putting people first. Respect for human rights, ethical business practices and responsible supply chains are fundamental to how CDS delivers value for its clients and the communities we serve.

We are therefore committed to continuously reviewing and strengthening our practices, engaging meaningfully with our supply chain and partnerships, and nurturing a culture of awareness and vigilance across our workforce.

1.2. During the reporting period, CDS reviewed the maturity of its compliance and governance arrangements as part of our commitment to continuous improvement. This resulted in the adoption of a managed compliance model, providing access to specialist compliance expertise, independent challenge and structured oversight across our compliance obligations, including those relating to modern slavery. As part of this transition, we have also reviewed the way we measure and report compliance activities to ensure future statements provide increasingly meaningful performance information and year-on-year transparency.

2. Scope

2.1. CDS, as a subsidiary of Bailie Group Limited, has chosen to report as a single entity to reflect the nature of our business and supply chains. This is CDS' annual Modern Slavery Statement, setting out our commitment to preventing modern slavery and human trafficking within our business and supply chain.

2.2. This Policy Statement applies to our financial year ending 31st December 2026 and applies to all our employees at all levels, agents, contractors, external consultants, third-party representatives and business partners and suppliers pursuant to the Modern Slavery Act 2015 (the 'Act').

3. Our commitment

Modern slavery is a serious crime and a fundamental abuse of human rights. It has no place in our business, our supply chain or the communities in which we operate.

At CDS, we believe that trust is earned not only through the quality of the technology and services we deliver, but through the way we conduct ourselves as an

organisation. Our **People First** philosophy means we place equal importance on how outcomes are achieved as on the outcomes themselves. We recognise that acting responsibly, ethically and with integrity is fundamental to maintaining that trust.

We are committed to preventing modern slavery and human trafficking in all its forms. This commitment extends across our own operations and throughout our supply chain. We expect the same high standards from our employees, contractors, suppliers, partners and everyone acting on our behalf.

We embed these expectations into our procurement and contracting processes, requiring suppliers to comply with all applicable legislation relating to modern slavery and to uphold equivalent standards within their own organisations and supply chains. Where concerns are identified, we will investigate them appropriately and take action where necessary, including ending business relationships where standards are not met.

Creating a culture where people feel confident to raise concerns is equally important. We encourage colleagues to speak up if they believe behaviour or practices are inconsistent with our values or our legal obligations, and we are committed to ensuring those concerns are treated seriously, fairly and without fear of detriment.

Preventing modern slavery is not a one-off compliance exercise. It is an ongoing responsibility that forms part of our wider commitment to good governance, responsible business practices and continuous improvement.

4. Responsibility and governance

4.1. The Managing Director of CDS has overall responsibility for ensuring this Statement reflects our legal and ethical obligations under the Modern Slavery Act 2015, and for promoting a culture in which ethical business practices are embedded throughout the organisation.

4.2. CDS operates a managed compliance model to support the continual development and oversight of its compliance framework. Working alongside the Managing Director and the wider leadership team, specialist compliance expertise provides independent advice, constructive challenge and assurance to help ensure our policies, processes and governance arrangements remain effective, proportionate and aligned to legislative and regulatory requirements.

4.3. Managers at all levels are responsible for ensuring that colleagues understand the standards expected of them, complete any required training, and are supported in recognising and reporting concerns relating to modern slavery or unethical practices within our operations or supply chain.

4.4. Every colleague, contractor and individual acting on behalf of CDS has a responsibility to uphold the principles set out in this Statement, to remain vigilant to

potential indicators of modern slavery, and to raise concerns promptly through the appropriate reporting channels.

5. Steps Taken to Comply with the Act

5.1. Risk Assessment

5.1.1. CDS periodically assesses the risk of modern slavery and human trafficking within its operations and supply chain. This assessment considers factors including geography, sector, supplier profile, workforce composition and the nature of the services provided. Based on our most recent assessment, we consider the overall risk to be low, with the highest potential areas of exposure relating to the engagement of contractors, recruitment agencies and elements of our wider supply chain.

5.2. Supplier Due Diligence

5.2.1. CDS undertakes due diligence on suppliers using a risk-based approach. Modern slavery considerations form part of our supplier onboarding and ongoing supplier assurance activities, with higher-risk suppliers subject to additional scrutiny where appropriate.

5.3. Employee Training and Awareness

5.3.1. CDS promotes awareness of modern slavery through employee induction, policy communications and compliance awareness activities. Colleagues are expected to understand their responsibilities, recognise potential indicators of modern slavery and know how to raise concerns where appropriate.

5.4. Employee Access and Compliance

5.4.1. Employees have access to the Anti-Slavery and Human Trafficking Policy through the Company's internal document repository and may raise questions or suggest improvements through their manager or the Company's compliance arrangements.

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

5.4.3. We encourage and support our employees in reporting concerns relating to modern slavery or unethical labour practices, and as such, have developed a modern slavery incident reporting procedure to enable our teams to recognise any incidents of modern slavery and report them appropriately.

5.5. Consequences for Employee Breaches of this Policy Statement

5.5.1. Failure to comply with this Policy may result in disciplinary action, up to and including dismissal where appropriate.

5.6. Suppliers Compliance with this Policy Statement

5.6.1. CDS communicates its expectations regarding modern slavery to suppliers, contractors and business partners at the outset of commercial relationships and reinforces those expectations through contractual terms, supplier engagement and ongoing governance where appropriate.

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 hold their own suppliers to the same high standards.

5.6.3. We expect all suppliers to comply with applicable legislation relating to modern slavery and to maintain equivalent standards throughout their own organisations and supply chains.

5.6.4. We expect suppliers to notify CDS of any actual or suspected breaches of modern slavery legislation or any material failures within their own supply chains that could affect the services they provide to us.

5.7. Consequences for Suppliers who breach this Policy Statement

5.7.1. Where a supplier fails to meet our expectations or is found to have breached applicable modern slavery legislation, CDS will take appropriate action. Depending on the circumstances, this may include requiring remedial action, suspending the relationship or terminating the contract.

5.8. Continuous Improvement

5.8.1. CDS recognises that preventing modern slavery requires continual vigilance and ongoing improvement. During the reporting period, we reviewed the maturity of our compliance and governance arrangements and adopted a managed compliance model to strengthen oversight, independent assurance and continual improvement across our compliance framework. As part of this work, we are enhancing the way compliance activities are measured and reported to improve transparency and support future reporting under this Statement.

6. Progress and commitments

2025 Progress	2026/27 Commitments
Continued supplier due diligence through procurement processes.	Formalise supplier risk reporting with quarterly oversight.
The Anti-Slavery and Human Trafficking Policy remained in force across the organisation and continued to support employee awareness and governance.	Annual review and Board approval of the statement.

Employee awareness maintained through induction and policies.

Introduce tracked refresher training and completion reporting.

Zero reported incidents of modern slavery concerns within CDS operations.

Continue to encourage Speak Up reporting and awareness.

7. Board approval

CDS recognises that preventing modern slavery is a shared responsibility requiring collaboration across our colleagues, clients, suppliers and partners. We will continue to review this Statement annually and evolve our approach in line with emerging risks, legislation and good practice, ensuring our governance arrangements remain proportionate, effective and aligned with our values.

Approved by the Board of Directors of Corporate Document Services Ltd

Alex Coates

Managing Director

Signature:



Date: 1st July 2026