



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This statement sets out The Baird Group's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

It is recognised that the Baird Group does not meet the financial threshold mandating a statement of this nature but the Directors believe such a statement is morally warranted.

As part of the technology and printing industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of The Baird Group and its subsidiaries namely:

- The Baird Group – operates as the holding company for a privately owned group of companies. As such the supply chain is limited to professional services organisations, i.e. Lawyers, Accountants etc.
 - Corporate Document Services Ltd (CDS) – a provider of business support and professional services encompassing Print Management, Design, Internet & Intranet solutions. As such it has a supply chain of Printers, Hosting/Cloud providers and offshore developers.
 - CDS Support Ltd (CDS DS) – a provider of professional services within the Defence sector. As such there is a limited supply chain outside of this community.
 - Newspress Ltd – a provider of automotive PR services and internet solutions. As such it has a supply chain of Hosting/Cloud providers and offshore developers.

Countries of operation and supply

The organisation currently operates in the following countries:

- United Kingdom – primary location for the activities of the Group and its subsidiaries
- USA – Newspress has as small (less than 5 staff) entity conducting PR distribution and associated services, enabling services are provided from the core Newspress UK Team.
- Italy – Newspress has as small (less than 5 staff) entity conducting PR distribution and associated services. As with the USA enabling services are provided from UK
- Cyprus – CDS DS has a team of UK personnel providing Defence Support Services

High-risk activities

No activities currently (September 2017) identified as High Risk.

Responsibility

Responsibility for the organisation's anti-slavery initiatives lies with the COO. The initiatives include:

- **Policies:** The COO is responsible for Management Systems within which Policies and Procedures for Supplier Management. All of which is under the ISO9001 framework.
- **Risk assessments:** The Managing Directors of the operating companies are responsible for risk assessment and management within their businesses. Supply chain failures are an element of this and will include modern slavery as a consideration in the selection and auditing of suppliers.
- **Investigations/due diligence:** The onboarding and ongoing audit of suppliers is under the remit of Supplier Management which is audited by the Compliance Management function. All of which is managed under the ISO9001 Management System. In the event a concern is raised regarding a supplier the COO will determine what, if any, further action is warranted.
- **Training:** During 2018 the Group will include an awareness of modern slavery into the training objectives of all relevant personnel.

Relevant policies

The Group operates the following policies that contribute to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

- **Whistleblowing policy** the Group encourages all employees, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Group's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** the organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier & Procurement code of conduct** the Group is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The Group and subsidiaries work with suppliers to ensure that they meet the standards of the code. The Group reserves the right to carry out due diligence audits on any supplier, at any time during the relationship between the supplier and the Group and its subsidiary companies.

Suppliers are required to sign a copy of the Code of Conduct as part of the onboarding process, with a copy held by CDS for the duration of the contract. Where any changes to the Code are required, an updated copy is sent to all suppliers for review and signature. The Code references the Group's principles including, but not limited to the following items:

- Living wages
- Freedom of association and right to collective bargaining
- The prohibition of child labour
- Confidentiality
- Anti-bribery and corruption

- The prohibition of harsh or inhumane treatment
- Environmental and Quality management
- **Recruitment/Agency workers policy** The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and reviews its existing suppliers. The organisation's due diligence and reviews include;

- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- conducting supplier audits or assessments through the organisation's own staff; these will now include a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices including where appropriate corrective action plans;
- invoking restriction or deselecting suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct.

Performance indicators

The Group periodically has reviews its key performance indicators (KPIs). There is an ongoing initiative enhance the current KPIs in respect of:

- Supply chain verification has been in place for several years. The process is being expanded to encompass modern slavery and allied concerns, this will be during the first half of 2018.
- In parallel with the expansion of initial verification, periodic reviews of its existing supply chains to reverify existing suppliers.

Training

The organisation will continue to review and determine the training needs of personnel engaged in supply chain and recruitment activities.

Awareness-raising programme

As well as by appropriate staff training, the organisation will through 2018 raise awareness of modern slavery issues by internal communications channels.

The communications will encompass:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation; and

- what external help is available, for example through the Modern Slavery Helpline.

Board approval

This statement has been approved by the Group Board of directors, who will review and update it annually.

Fergus Bailie

Chief Executive Officer

The Baird Group

25 October 2017