

Modern Slavery and Migrant Worker Policy IMS-PT-MSM-01

**CDS Defence & Security Internal Standard
DSIS 17483:2025**



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Author	Peer Reviewer	Authoriser
Phil Walton	Jim Fisher	Jim Hamilton
Quality and Compliance Manager	Operations Manager	Operations Director
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Modern Slavery and Migrant Worker Policy

1 Purpose and Scope

This Modern Slavery and Migrant Worker Policy is part of the DSIS 10808 People Team IMS, which is governed by the broader DSIS 17483 Overarching IMS. It outlines CDS Defence and Security's (CDS DS) commitment to preventing modern slavery, human trafficking, and the exploitation of migrant workers across our operations and supply chain. We aim to uphold the highest standards of ethical conduct and legal compliance, ensuring that all individuals involved with CDS DS are treated fairly and with respect. This policy applies to all employees, contractors, and third parties engaged with CDS DS, including our supply chain.

This policy forms a critical component of our integrated management system, aligned with our broader operational framework under DSIS 17483. As part of this framework, we are committed to ensuring that all activities comply with UK laws, international standards, and best practices regarding modern slavery and migrant worker protections.

2 Commitment to Tackling Modern Slavery and Exploitation

CDS DS acknowledges the serious issue of modern slavery, which encompasses human trafficking, forced labour, bonded labour, and other forms of exploitation. As part of the DSIS 10808 People Team IMS, we are committed to:

- Maintaining a **zero-tolerance** approach towards modern slavery in our business operations and supply chain.
- Ensuring the full protection of workers, particularly migrant workers, by providing a safe and supportive working environment free from exploitation.
- Ensuring transparency in our supply chains and conducting due diligence to identify and mitigate the risks of modern slavery.
- Taking proactive measures to ensure that workers' rights are upheld and their wellbeing protected, in line with **ISO 45001** for occupational health and safety and ethical employment practices.

3 Legal and Regulatory Framework

CDS DS complies with all relevant UK legislation, international standards, and regulations in relation to modern slavery and the treatment of migrant workers. This includes, but is not limited to, the following:

- Modern Slavery Act 2015
 - As part of the DSIS 10808 People Team IMS, we comply with Section 54 of the Modern Slavery Act, which mandates companies to produce an annual statement outlining steps taken to address modern slavery within operations and supply chains.
- The Immigration, Asylum and Nationality Act 2006
 - CDS DS adheres to the legal requirements for ensuring that migrant workers have the appropriate permission to work in the UK, and that their rights are not compromised by exploitative practices.
- The Gangmasters (Licensing) and Modern Slavery (Amendment) Act 2017
 - We ensure that we meet the requirements of the Gangmasters Licensing Authority, especially in high-risk sectors like agriculture, horticulture, and shellfishing, preventing exploitation within these industries.
- The Equality Act 2010
 - We uphold protections against discrimination and exploitation, ensuring that migrant workers and all employees are treated with dignity and respect.
- International Labour Organization (ILO) Conventions
 - CDS DS aligns with the **ILO's Forced Labour Convention No. 29** and **Abolition of Forced Labour Convention No. 105**, advocating for the eradication of forced labour and modern slavery practices in all sectors.
- European Union Anti-Trafficking Directive
 - While the UK has exited the EU, we remain aligned with the spirit of this directive, ensuring that trafficking protections and victim support mechanisms are integrated into our business practices.

4 Key Principles

CDS DS is committed to ensuring the following principles are upheld throughout our operations, supply chain, and relationships with migrant workers:

1. **No Forced Labour:** We will not tolerate forced, compulsory, or bonded labour. All employees, including migrant workers, are employed voluntarily and can leave employment subject to contractual terms.
2. **Fair and Transparent Employment Practices:** We are committed to transparent recruitment, ensuring that all employees, including migrant workers, are hired under fair conditions with written contracts outlining their rights and responsibilities.
3. **Freedom of Movement:** Workers must have the freedom to leave their employment without fear of retaliation or penalty. CDS DS ensures that personal documents such as passports and identification are not withheld by the employer or any recruitment agent.
4. **Migrant Workers' Rights:** We ensure that migrant workers are treated fairly, with the same protections and benefits as their UK-based counterparts. Their rights are safeguarded by providing access to appropriate channels for reporting exploitation and ensuring that their contracts and conditions are fully compliant with UK law.
5. **No Exploitation of Migrant Workers:** We take extra care to ensure that migrant workers, who may be more vulnerable to exploitation, are provided with a safe environment, legal working conditions, proper wages, and the opportunity to report any concerns without fear of retaliation.
6. **Supplier Responsibility:** We expect all suppliers and contractors to adhere to this policy. We require transparency in their recruitment and employment practices and monitor compliance through regular audits and due diligence processes.

5 Responsibilities

- **Senior Leadership:** Senior management is responsible for overseeing the implementation of this policy across all operations. Leadership will ensure adequate resources are allocated to combat modern slavery and ensure migrant workers' rights are respected, while being accountable for compliance with DSIS 10808 People Team IMS.
- **Managers:** Managers are responsible for ensuring this policy is adhered to within their teams and departments. They will ensure workers are hired and treated fairly, and that any concerns regarding exploitation or trafficking are promptly addressed in line with the company's protocols.
- **Employees:** All employees must comply with this policy, treating others with respect and reporting any suspected incidents of modern slavery or worker exploitation. Employees are encouraged to use the reporting mechanisms available to raise concerns safely and confidentially.

- Suppliers and Contractors: CDS DS requires that all suppliers, contractors, and third-party partners comply with this policy. We will regularly audit our supply chain and ensure our partners uphold the highest standards regarding modern slavery and migrant worker exploitation.

6 Risk Assessment and Due Diligence

To manage the risk of modern slavery within our operations and supply chain, CDS DS will:

- Risk Assessments: Conduct periodic risk assessments across our supply chain, particularly in high-risk areas such as manufacturing, construction, and agricultural industries, to identify and mitigate any potential modern slavery risks.
- Supplier Audits: Regularly audit our suppliers and contractors to verify compliance with this policy. The audits will focus on recruitment practices, employee rights, wages, working conditions, and whether there are any indications of forced labour or trafficking.
- Supplier Code of Conduct: CDS DS will ensure all suppliers adhere to a strict code of conduct that requires compliance with this policy. Any supplier found to be in violation will be subject to remedial action, including possible termination of contracts.

7 Training and Awareness

CDS DS is committed to providing all employees, managers, and relevant stakeholders with training on modern slavery, including the identification of warning signs, the processes for reporting concerns, and the steps for mitigating risk. This includes:

- General employee training on modern slavery risks and reporting mechanisms.
- Manager-specific training to ensure those in leadership roles can recognise and act on issues related to modern slavery and migrant worker exploitation.
- Specialised training for those working directly in high-risk areas, such as supply chain management, human resources, and procurement.

8 Grievance Mechanisms and Support

CDS DS provides clear and confidential grievance mechanisms for all workers, particularly migrant workers, to report any concerns regarding their treatment or conditions. These mechanisms will:

- Ensure reports are handled promptly, fairly, and confidentially.
- Offer support to those who raise concerns, including protection from retaliation and victimisation.
- Provide access to external agencies that can support workers, including legal advice, counselling, and advocacy.

9 Monitoring and Reporting

CDS DS will monitor and report on our progress in combating modern slavery and supporting migrant workers through:

- **Annual Reporting:** An annual statement will be published as required by the Modern Slavery Act 2015, detailing the steps taken CDS DS to address modern slavery risks, as well as any incidents identified.
- **Internal Audits:** Regular audits of operations and supply chains will ensure ongoing compliance with this policy and identify areas for improvement.
- **Employee Feedback:** Employees will be encouraged to provide feedback on the effectiveness of our anti-slavery measures through surveys and other communication channels.

10 Enforcement and Consequences

Any individual or organisation found to be in breach of this policy will face appropriate disciplinary action, including the termination of employment or contracts, and, where applicable, legal action. Any supplier found to be exploiting workers or violating the terms of this policy may be removed from our supply chain.