



CDS Labour Incorporating: CDS Labour Fair-Responsible-Ethical-Diverse (FRED0010)/
CDS Labour Agriculture/ Fred Bassett & Son/ CDS Accommodation/
CDS Drivers/ Free2Move Ltd (FREE0001)/AGRIX Ltd (AGRI0001)

Modern Slavery Statement 2026



Introduction

CDS Labour, Fair Responsible Ethical Diverse Ltd t/a CDS Labour is committed to working to the highest ethical standards and complying with all laws, regulations and rules relevant to our business. Our reputation is paramount, and we take our corporate and social responsibilities very seriously, and this is embodied in our CDS Labour mission statement in which we strive to provide a reliable and fully ethically sourced labour supply at all times. CDS Labour also fully accept and recognise the importance of both assessing and dealing with the risk of Modern Slavery, and also the impact it has both on individuals and businesses.

Section 54, (Transparency in Supply Chains), of the Modern Slavery Act 2015 requires businesses who have a turnover in excess of £36m, to publish an annual statement to state what actions the business has taken during the financial year to ensure that modern slavery has not taken place within either the business directly, or within supply chains.

Although CDS Labour is at present under the required threshold to make the publishing of a modern slavery statement mandatory, we are fully committed to ensuring that policies and measures are in place throughout the business to both reduce risk, and to help towards eradicating modern slavery, as part of our recruiting strategy. To demonstrate commitment, CDS Labour has decided to publish our modern slavery statement which refers to the financial year ending on 31st March 2027. It sets out the actions taken to reduce risk within all parts of the business, both internally and externally, including our processes of managing the risk of modern slavery for any worker supplied to any client.

Modern slavery is the severe exploitation of other people for personal or commercial gain and is all around us, but often just out of sight. We all, therefore, have a responsibility to be alert to any risk, however small, and we commit to training our recruitment consultants, managers and our workers, in what to look out for, so that they may be more aware, and can report any concerns, however small, at the earliest stage.

We are also committed to reducing the risk of Human Trafficking which is the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud, coercion or deception, with the aim of exploiting them for profit. The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal is not acceptable and our strategy will help ensure that this does not happen.

Similarly, we also condemn the use of forced labour where people are forced to perform work or services against their will, usually under the threat of punishment or violence and we commit to working with our staff and stakeholders in order to prevent all aspects of Modern Slavery.



Our Business

Firstly, **CDS Labour Fair Responsible Ethical Diverse Ltd t/a CDS Labour** is a GLAA licensed labour provider (**FRED0010**) supplying workers to many clients across the UK. The Head Office is based at Chapel Farm Spalding where the family have lived for many years and still to this day farm the land. The CDS Labour managing director Carl Steele has built the business from its early conception where originally only drivers were provided, and there are now currently the following offices and locations both in the UK and abroad:

Branch/Office	Address
Head Office (Spalding)	The Office, Chapel Farm, Hop Pole, Spalding, Lincolnshire
National Service Centre	The Bomb Shelter Vicarage Farm Road Peterborough Cambridgeshire PE1 5TP
Spalding	1 – 3 Bond Street Court, Spalding, Lincolnshire
Wisbech	1 Harbour Square, Wisbech, Cambridgeshire
Boston	110 High Street, Boston, Lincolnshire
Whitecat	Old Leake Caravan Park, Shaw Lane, Old Leake, Boston
Laurencekirk	Dykelands Farm Laurencekirk AB30 1UP
Peterborough	237 Lincoln Road, Peterborough, Cambridgeshire
Dundee*	The Royal Exchange Office 14 Panmure Street Dundee Scotland
Huddersfield*	Office 1 Station Street Buildings 2 St Peters Street Huddersfield
Aberdeen*	HQ, 1 Berry Street Aberdeen, Scotland
Hull*	Norwich House I Savile Street Hull
Sofia*	Sofia 1202. Boulevard "Maria Louisa" No. 102. Traffic Market, Office 12, Bulgaria.

* Seasonal or Pop-Up Offices or Branches

We supply our workers to many clients across the UK from Scotland to the south coast and proactively work to ensure workers are protected at all times and levels of compliance are achieved and maintained. CDS Labour do not use agents in order to recruit our workers either within the UK or those from abroad, we only use our own employed and trained staff. Due to the changes in the UK immigration system which were introduced in January 2021, recruiting from countries outside of the UK is now more complex and difficult so we ensure that our recruiters are fully aware of what they need to see with regards to any individuals right to work, prior to confirming their employment with CDS Labour. In the last few years CDS has reduced its recruitment abroad and a large percentage of our workforce are now recruited from within the UK albeit a number of different nationalities. By recruiting less from countries abroad this also lowers our overall risk of Modern Slavery, and all our recruiting is as direct as possible, and we are aware of how to spot signs of any issues.

CDS Labour do not use any sub-contractors to supply labour to any of our clients, all of our labour is recruited and supplied by us, and all workers are contracted with us throughout.



CDS Labour will not support, or deal, with any business knowingly involved in slavery, human trafficking or exploitation. We expect and actively work with all of our clients, to ensure that they operate fair and ethical workplaces, where workers are treated with dignity and respect and the highest standards of human rights are upheld. We always ensure that prior to any supply we visit the prospective client and ensure that they are both knowledgeable and proactive in terms of combatting Modern Slavery and that material such as posters or helplines are available to workers.

Secondly, we wish to state that due to our continued success we have been able to acquire other agencies/businesses to add to our ever-growing portfolio. The result of this is that CDS Labour will now be able to offer more services to many more clients right across the UK and hence provide more jobs for more workers.

Since our expansion we now have a group of businesses which comes under **CDS Labour (Group UK) Ltd** with our main trading arm being **CDS LABOUR FAIR-RESPONSIBLE-ETHICAL-DIVERSE LTD t/a CDS Labour**.

Most of our businesses within the group trade under the same name of CDS Labour which means that all of our workforce can be assured of the same terms and conditions and respect of their rights throughout all of our group of businesses.

The CDS group now incorporates the following businesses:

CDS Labour Fair-Responsible-Ethical-Diverse (FRED0010)/CDS Labour Agriculture/ Fred Bassett & Son/ RTL Payroll/ CDS Accommodation/ CDS Drivers/ Free2Move Ltd (FREE0001) & AGRIX Ltd (AGRI0016)

Our operating model within the sectors regulated now by the **Fair Work Agency** is simplified by utilising CDS Labour Fair-Responsible-Ethical-Diverse Ltd (FRED0010), as the contract holder with all customers while Free2Move Ltd (FREE0001) supply the labour. We adopt a common governance approach throughout the group, so all workers' rights are fully respected at all times, and all of our processes and policies are common to CDS Labour as the trading name.





Policies & Processes

In order to demonstrate our commitment, we have, since 2019, invested in external specialist assistance to ensure that all of our legal obligations are met in full, and that our processes and policies are reviewed, amended where necessary, and are robust, in order that any risk of modern slavery remains low at all times.

Working with our in-house CDS Labour compliance team, Neil Court, director of *nacsolutions*, was the former Head of Compliance at the Gangmasters and Labour Abuse Authority (now part of the Fair Work Agency), and over the past few years Neil has provided much needed advice and guidance, that has enabled us to reduce the risk posed by exploitation and modern slavery. Policies and processes have been created, reviewed and amended, liaison improved with external agencies, and where issues or suspicion has arisen, these have been dealt with quickly and effectively.

Our improved liaison and relationships with regulatory and/or enforcement bodies and indeed our customers, has enabled CDS Labour to be much more proactive, reporting any issues immediately, and working collaboratively towards corrective and appropriate action. We have introduced training, both new and refresher, so that we can ensure that our staff recruit in a consistent and thorough way and that they are trained in how to spot and report modern slavery or exploitation.

Our **Modern Slavery Policy Statement** commits us to understanding modern slavery risks and ensuring that modern slavery and human trafficking is not taking place in our business or associated stakeholder supply chains.

This policy statement applies to all persons working for us, or on our behalf in any capacity, including employees at any level, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third party representatives and business partners.

All personnel and stakeholders are made aware of the policy, which is managed by our operations and compliance team. Breaches of the policy will be dealt with accordingly either via disciplinary action or by terminating existing relationships.

We also have a CDS Labour **Forced Labour Policy** which recognises the responsibility that we share with our stakeholders to tackle forced labour. CDS Labour commit to the principles that are drawn from ILO Conventions, Protocols, Recommendations and Instruments such as the Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and the UN Guiding Principles on Business and Human Rights.



The principles address businesses and aim to provide clear and practical interpretation of international labour standards. They should be applied by all CDS stakeholders.

This policy will apply to all CDS Labour staff and stakeholders, and where appropriate their respective supply chains.

CDS Labour are also fully committed to compliance with the ETi Base Code and as such we have an ***ETi Base Code Policy***.

The ETi Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an **internationally recognised code of good labour practice**. It is viewed as a global reference standard and is widely used as a benchmark against which to conduct social audits and develop ethical trade action plans. The Code was also the basis for the GLAA Standards, against which CDS Labour are regulated as a Licensed business. As part of our requirement to retain our GLAA Licence we must maintain compliance against these standards and similarly therefore against the ETi Base Code.

Our **registration process** informs each worker we recruit, how to get help should they experience any issues of exploitation and/or modern slavery, and we provide both contact numbers for various organisations that can help and also all workers have access to a 24/7 **confidential helpline**.

Our **Whistleblowing Policy** advises workers how they can raise issues without detriment, providing alternatives if they are not comfortable with raising these via their manager or supervisor.

Aside from cascading this information at the recruitment stage we also ensure that workers have access to all of this information at all times, and posters are placed on notice boards at client sites to assist workers if they need help urgently.

Since last year we have also introduced some additional policies in order to demonstrate our commitment to tackling Modern Slavery and preventing exploitation.

Our **Responsible Recruitment Policy** is designed to provide all CDS Labour staff & management with a responsibility for recruitment, selection, interviewing & appointing both workers and employees with a framework for compliant, safe, ethically responsible and effective recruitment methods, always following best practice & country legislation. It covers the recruitment of workers, both within the UK, and overseas, workers recruited for permanent placements for clients, and internal recruitment for CDS Labour employees (full and part time).

We also have a separate **Recruitment Policy** whereby we commit to recruiting

- In an equal and inclusive way that is consistent with our Equality & Diversity Policy and other UK employment legislation and good practice
- Through a consistent, fair and ethical process at all times

Our **Remediation Policy** recognises the responsibility that CDS share with our suppliers to provide remedy to victims of slavery.

Successful remediation is not easy to achieve and requires a victim-led, consultative and multi-stakeholder approach. The policy below is drawn from best practice guidance on remediation and builds on the requirements of ILO Conventions, Protocols, Recommendations and Instruments such as the Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and the UN Guiding Principles on Business and Human Rights.

The policy is intended to provide a practical framework for businesses to apply remedy should they encounter victims of slavery in their business or in their supply chains.



We have also introduced our **Human Rights** policy within the last year which is guided by international human rights principles encompassed in the UN Guiding Principles and CDS are committed to the ILO standards and Ethical Trading Initiative & complete adherence to the Eti Base Code.

A table showing our total policy list is shown below:

Policy/Statement
Anti Bribery & Corruption
Anti-Fraud
Bullying & Harassment
Complaints & Whistleblowing
Data Protection
Email & Internet Usage
Equality Diversity & Inclusion
Ethical Trading
Eti Base Code
Forced Labour
Grievance Policy & Procedure
Health & Safety
Human Rights Policy
Recruitment
Remediation
Responsible Recruitment
Return to Work
Sickness
Workers Conduct & Behaviour





Awareness & Training on Modern Slavery

As previously indicated, we have invested in external help in order to reduce the risk of Modern Slavery, and as such we ensure that all of our recruitment staff & management are fully trained to be able to spot and report the signs at the earliest possible stage. Refresher training is also completed via Stronger Together or the ALP and/or delivered to staff periodically to ensure that we operate in a consistent way and our processes and policies are rigorously checked both externally and internally via regular audits.

We are members of **SEDEX** and have undergone in 2020, at our own expense, a **SEDEX 2 Pillar SMETA** audit, which on completion, only revealed a couple of minor issues, which were addressed with immediate effect. SEDEX allows our customers, who are SEDEX members to view our audit and our annually completed Self-Assessment Questionnaire (SAQ) , so that we can operate in a fully transparent way at all times.

We previously worked closely with the **Gangmasters & Labour Abuse Authority (GLAA) now as from April 2026 the Fair Work Agency** and we regularly attended meetings and webinars sharing our input and experience with other labour providers, labour users and other stakeholders such as retailers. In 2025 as part of our expansion the GLAA completed a compliance inspection on our businesses, and our licences remains unchanged, full and with no additional conditions. Carl Steele the Group Managing Director, was duly appointed as Principal Authority on each of the newly acquired licensed businesses.

We work with the **Association of Labour Providers** as an active member attending training courses and informative webinars as required, ensuring that we keep fully up to date with any changes in legislation that may affect our business. We are members of **Stronger Together**, and are now in the process of again renewing our registration as a **Stronger Together Business Partner** and three of our management team (including our external compliance consultant) successfully completed the **Tackling Modern Slavery in UK Businesses** training course in September 2025.

Within the past year we have also introduced our **CDS Modern Slavery Awareness Pack** which we provide electronically to all our workers once they have been officially recruited.

This information states the following:

Modern Slavery is a global problem and international crime, affecting millions of people worldwide, including many victims within the UK. Men, women and children of all ages and backgrounds can fall victim to human trafficking, forced labour or debt bondage. Victims are controlled by force, threats, coercion, abduction, fraud and deception.

Within your Worker Handbook we have a specific section (4) about this, which you must read and ensure that you have understood how you can get help if you feel that you are a victim of Modern Slavery. Section 5 within your Worker Handbook also contains many useful numbers of different organisations who will provide help if you feel



that you cannot or would prefer to speak to an individual outside of CDS Labour.

We want to ensure that you are protected at all times so within this pack we have included some very useful information from Stronger Together, an organisation with whom we work closely to help prevent exploitation and Modern Slavery. It contains information on the signs to look out for and also about Private Home Rental and Landlords and is given in different languages.

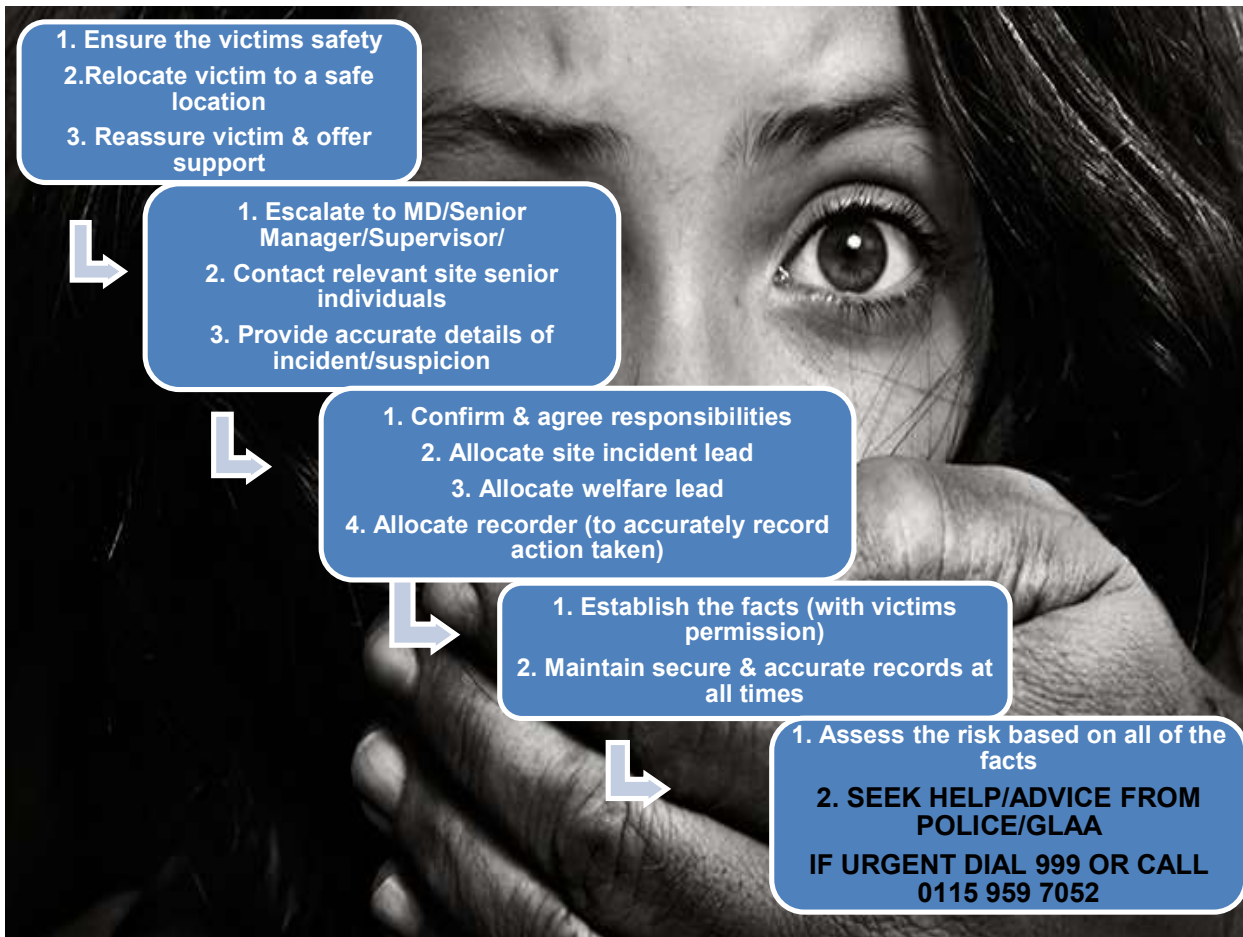
If you think that any of the issues within this pack apply to you, don't delay, act now by contacting the organisations on the numbers given or if you prefer speak to a senior manager at CDS.

Remember everything you say will be treated as confidential, you will receive help and you will be protected.

As part of our awareness pack workers are provided with the following leaflets:



CDS Labour Fair Responsible Ethical Diverse Ltd t/a CDS Labour Incident Process



Although at present we consider that our risk of encountering modern slavery within our businesses are low, we cannot be complacent about our actions and processes. Modern Slavery can happen anytime, and anywhere, and if discovered or suspected it is important that we have a robust process in place to deal with it and that our staff are trained to deal with it efficiently and effectively. CDS Labour have introduced an incident process policy and guidance (above), in order to ensure that we have a clear structure that has been cascaded to all personnel about what action they must follow in the event of an actual or suspected case of modern slavery.

As stated previously, this process aligns with our **Remediation Policy** which recognises the responsibility that CDS share with our suppliers to provide support & remedy to victims of slavery.





Aims and Objectives 2026/27

CDS Labour Fair Responsible Ethical Diverse Ltd t/a CDS Labour will continue to commit to reviewing all existing processes and policies in relation to modern slavery and to ensure that the risk remains low throughout the group businesses and supply chains.

Within the last year the company has undergone a further restructure, and we have expanded and acquired a number of agencies that will now come under our trading umbrella as above. All our businesses within the CDS Group are now run on a common governance basis, which will include our commitment to tackling and eradicating all forms of Modern Slavery and exploitation. Currently at the date of writing this statement CDS Labour Fair Responsible Ethical Diverse Ltd t/a CDS Labour (GLAA Ref FRED0010) incorporates the following businesses:

CDS Labour Fair-Responsible-Ethical-Diverse (FRED0010)/CDS Labour Agriculture/ Fred Bassett & Son/ RTL Payroll/ CDS Accommodation/ CDS Drivers/ Free2Move Ltd (FREE0001) & AGRIX Ltd (AGRI0016)

We intend to implement the following:

- Ensure that our Modern Slavery Policy Statement, Remediation Policy, Forced Labour Policy, ETi Base Code Policy and Incident Process is cascaded to all personnel within all businesses both internally and externally
- Continue to attend relevant training, attend and also to deliver refresher courses on MS in 2026.
- Review our existing induction in relation to modern slavery to ensure all staff are fully appraised of MS awareness training on how to "spot the signs"
- Test our incident process policy and guidance to all relevant staff to ensure we have a clear path and an assigned management lead for any identified issue
- Continue to liaise and work with regulatory and enforcement bodies & all stakeholders in order to reduce risk and to assist with any identified cases of Modern Slavery and/or Exploitation.
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This statement was reviewed and approved by **Carl David Steele** Managing Director of CDS Labour

The statement will be reviewed annually and published.

Signed



Dated 21st April 2026

