

# OCS Group Policy.

## Modern Slavery policy

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As a large international diverse business with over 120,000 employees, we recognise the gravity of modern-day slavery and the devastating impact it has on individuals, communities, and society.

Modern Slavery is the exploitation of an individual by others, for personal or commercial gain, and includes but not limited to human trafficking, forced labour, and debt bondage.

As a supplier of services across several continents, we are at particular risk to modern slavery, through our supply chains, including the recruitment and employment of workers, especially in cleaning, security, and maintenance, and we need to be vigilant.

Our TRUE Values of Trust, Respect, Unity, and Empowerment, underpin the decisions we take and guide us to do business the right way, to prevent and eliminate all forms of modern slavery within our operations and supply chains.

This policy outlines our commitment and approach to tackling modern slavery, to remove this abhorrent crime in any way that we can.

### **Leadership and responsibility**

The OCS Group Executive Committee have overall responsibility to oversee the implementation of this policy, ensuring that it is fully integrated into our operations and supply chain management.

Members of the Group Executive Committee sit on our Global Anti-Slavery Committee, which meets on a quarterly basis, and provides a forum for representatives across the business to input on the Group's policies and procedures relating to modern slavery.

Chaired by the ESG Director for the UK&IE, the committee engages in discussions on potential risks and formulates plans for improvements to prevent instances of modern slavery.

We also recognise that this is a shared responsibility, and we call on our colleagues, suppliers, and partners to support us in this important mission to create a world free from slavery and exploitation. Together we can make a significant difference in the fight against this abhorrent crime.

### **Legal compliance**

OCS Group acknowledges its responsibility to address modern slavery in all its forms, including but not limited to forced labour, child labour, human trafficking, and bonded labour, within our own operations and throughout our supply chain. We will comply with all relevant laws and regulations aimed at preventing and addressing modern slavery and human trafficking, including the Modern Slavery Act 2015 in the UK and equivalent laws in other jurisdictions where we operate, such as the Australia Commonwealth Act 2018.

### **Risk mitigation and supply chain transparency**

Eradicating modern slavery is a serious ethical global challenge, which requires a comprehensive approach, especially for employers with transient workforces, such as common in facility management services, like hospitality, security, and cleaning.

We proactively work to identify, assess, and mitigate the risk of modern slavery within our operations and supply chain.

During our robust onboarding, vetting process, and right to work checks, we use technology to help our recruiting managers to confirm a person's identity.

We require all suppliers agree to our Supply Chain Code of Conduct and our Responsible, Ethical, and Sustainable Procurement Policy that sets out our expectation of any supplier wishing to work with OCS. Both incorporate a range of topics including bribery, human rights, and modern slavery and they reflect the conventions of the United Nations International Labour Organisation and the Ethical Trading Initiative (ETI) Base Code.

### **Our Risk mitigation strategy includes:**

Working with the Slave Free Alliance to regularly challenge existing practices and pinpoint opportunities for enhancement

- Reviewing our supply chain to identify areas of potential risk, such as recruitment, and working collaboratively to address and mitigate identified risks
- Monitoring our suppliers adherence to our anti-slavery policies to ensure compliance
- Incorporating modern slavery into our global risk register to guarantee comprehensive oversight
- Conducting thorough due diligence in high-risk areas or sectors, such as hospitality, and temporary labour, through robust onboarding processes
- Encouraging our suppliers to establish their own anti-slavery policies and procedures where they don't currently

### **Training and reporting**

Mandatory modern slavery training is provided to our employees, contractors, and shared with our suppliers, to raise awareness, highlight the risks to our business and the impact on people's lives. This training includes information on the different types of modern slavery, how to recognise the signs, the steps to take in response to suspicions, and stresses our internal reporting procedure.

We have established clear and confidential reporting procedures for employees, suppliers, and other stakeholders to report any concerns or suspicions related to modern slavery.

We will continue to provide a Whistleblowing process via our "Safecall" service, through which all colleagues, contractors, and customers, can report any number of concerns, including modern slavery. We will investigate all reports thoroughly and take appropriate actions in response to any identified issues.

### **Continuous improvement**

We are committed to ongoing improvement in our efforts to combat modern-day slavery and will regularly review and update this policy to reflect changing circumstances, best practices, and legal requirements. We will work with external experts to ensure our processes and procedures are fit for purpose and set measurable targets to assess our progress and report on our efforts.

Eradicating modern-day slavery from society is difficult and challenging, and cannot be achieved by individual companies, this is a shared responsibility. We call on our employees, supplier, and partners to support us in this important mission to create a world free from slavery and exploitation. Together we can make a significant difference in the fight against this abhorrent crime.



Bob Taylor –  
Group Chief Operating Officer



Peter Seeley -  
Group Head of ESG