



Modern Slavery Statement

2023/24

Contact

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WE ARE OCS



Modern Slavery Statement

The UK Modern Slavery Act 2015 (the 'Act') requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains. The statement is made pursuant to section 54(1) of the Act and sets out the approach being taken by OCS Group Topco Limited and its subsidiaries (the "OCS Group") to prevent the risk of modern slavery and human trafficking in its businesses and across the supply chain. This statement constitutes the OCS Group's modern slavery and human trafficking statement for the financial year ending 31 December 2023.

Modern slavery is a growing concern globally. The data tells us that the numbers of people suffering from this terrible crime are increasing, an estimated 50 million people in modern slavery worldwide¹.

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

We are very much aware that as supplier of critical services across several continents we are at particular risk to modern slavery through our supply chains (including the recruitment and employment of workers) and therefore we need to maintain a high level of vigilance. We recognise our responsibility to uphold human rights, foster trust and ensure we continually review our practices which we do with the help of external expert partners such as the Slave Free Alliance ("SFA").

Our commitment is both clear and achievable - to eradicate modern slavery and human trafficking within our business and our supply chains, within the UK and overseas, and to help remove this abhorrent crime in any way that we can.

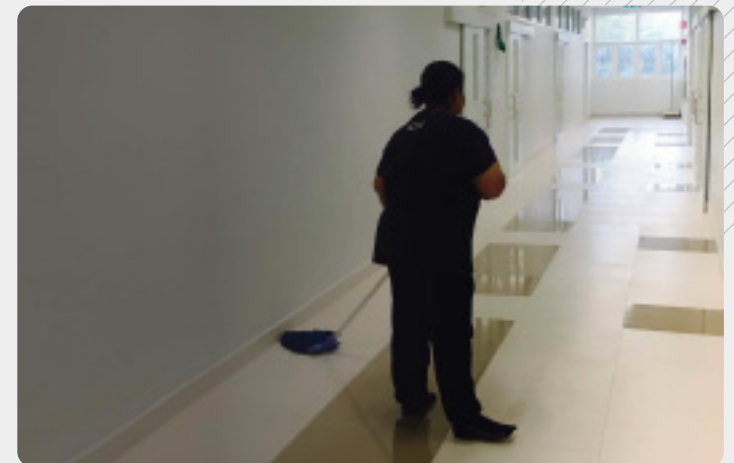
Rob Legge

Rob Legge

Group CEO

June 2024

We remain committed to ensuring modern slavery becomes a thing of the past.



About this Statement - This Statement has been published in accordance with the Modern Slavery Act 2015. The Statement sets out the approach being taken by OCS Group to prevent the risk of modern slavery and human trafficking in its businesses and across the supply chain.

¹ILO (International Labour Organization) 2022

OCS Structure, Business and Supply Chains

The OCS Group is an international leader in facilities management, providing a full range of crucial services to more than 8,000 customers in the UK, Ireland, the Middle East, and Asia Pacific. Services we provide include hard services, facilities management, cleaning, catering, security and pest control.

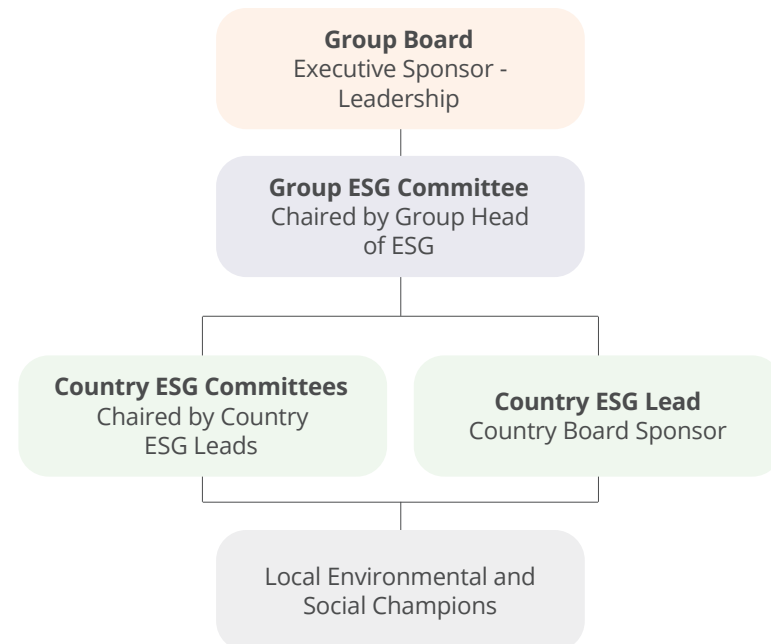
The OCS Group has supported its customers for over a century, growing from a small family-owned window cleaning service to a highly respected international business. Services are provided to customers across a range of sectors and in a variety of environments, from corporate offices and hospitals to stadiums and shopping malls to manufacturing facilities, airports, data centres, and courtrooms. Our 120,000+ strong international team of cleaners, security guards, technicians, and service experts provide specialist and sustainable solutions that enhance the businesses of our customers every day. To fulfil our obligations to our customers, we procure goods and services from a wide range of suppliers both in the complex mega space and SMEs. Examples of goods and services we procure include cleaning equipment, waste management services and food ingredients. Also, as a leading facilities services provider we also recruit a flexible workforce to meet the demand of our customers. We complete all necessary due diligence with our suppliers and ensure we continue to review processes in place to ensure that modern slavery is not occurring in any tier of our supply chain.

120,000+ Colleagues	8,000+ Customers	20+ Countries	£1.9bn Revenue
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Leadership and Governance

The Group ESG Steering Committee was established in 2023. The Committee will support the implementation of the OCS Group's ESG Strategy, including governance, systems, processes, training and communication across our global business. This broad and important remit includes topics such as modern slavery and human rights, which will be overseen by the Committee's permanent members. The committee members are from various functions across the Group's geographical regions – which includes Legal, Procurement, Operations, Human Resources, Finance, Quality, Health, Safety and Environment (QHSE) and ESG. Cognisant that modern slavery is an area of high importance for the business, in 2023 we worked with our partners, SFA, to undertake a gap analysis to identify areas of improvement and to further align strengths and good practice that already exist in the OCS Group for the benefit of the wider business. One key outcome from the process is the decision to formulate a new Group Anti-Slavery Committee in the second half of 2024.

The OCS Group's ESG governance structure is as follows:



Our partnership with the industry experts

As already detailed in this statement, the OCS Group has partnered with the SFA and is an active member of the SFA's membership programme.

The SFA acts as a critical friend and provides the business with guidance and consultancy support on the topic of modern slavery. An SFA representative will sit on the Group Anti-Slavery Committee once established later in 2024. We also work together to design programmes which will increase the exposure and understanding of modern slavery across our business. The SFA supported the build of our modern slavery training which is mandatory for all colleagues. Representative entities within the OCS Group have been members of the SFA for more than four years and improved processes and policies have been developed as a result.

OCS continues to demonstrate great commitment in identifying and mitigating the risk of modern slavery and labour exploitation within its operations and supply chains. OCS has further developed its processes and procedures to support its ongoing commitment to protect its workforce. SFA looks forward to supporting OCS in its anti-slavery agenda in 2024 and beyond.

Elenor Smith

Senior Advisor - Human Rights in Supply Chains

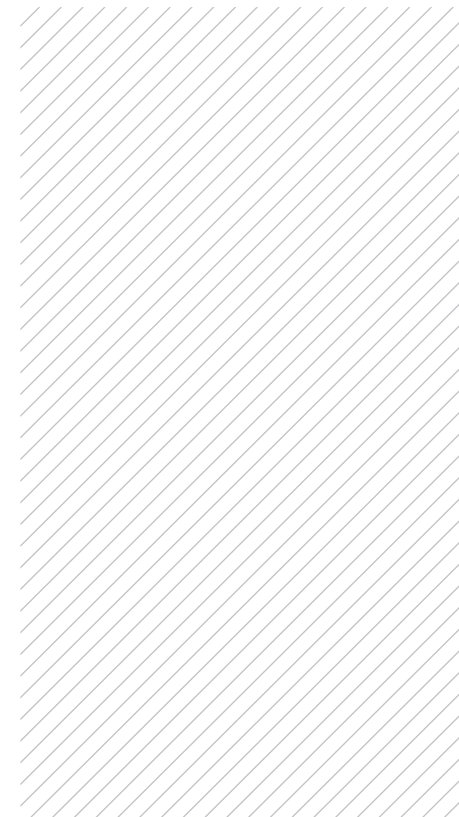


OCS policies on slavery, human trafficking and due diligence

The OCS Group has adopted a Group Code of Conduct which is shared with all colleagues to ensure that our corporate standards are met at every level in our organisation. We expect our people to behave in the spirit of this code. The OCS Group has several policies in addition to the Group Code of Conduct such as: 1) Group Modern Slavery Policy, 2) UK&I Responsible, Ethical and Sustainable Procurement Policy and 3) UK&I Supplier Code of Conduct.

The policies cover various topics related to modern slavery including:

- Anti-Bribery
- Ethical Trading
- Recruitment and Vetting
- Eligibility to Work
- Whistleblowing
- Working Time Regulations
- Responsible Procurement



Procurement and Supply Chain

Due diligence

Suppliers to the OCS Group are segmented, and risk assessed across a key set of parameters along with a risk assessment based on category to identify high risk supply areas, such as contingent labour, security etc. It is also standard practice to require all suppliers to sign our Supplier Code of Conduct and confirm their agreement to adhere to our Responsible, Ethical and Sustainable Procurement Policy. The Code makes clear the expectation we have of any supplier wishing to work with us. Both the Code and Policy incorporate a range of topics including anti-bribery and modern slavery and reflect the conventions of the United Nations International Labour Organisation and the Ethical Trading Initiative Base Code.

These include that our supply chain:

- a) Does not contain child labour, or labour which is forced.
- b) Provides safe working conditions for all workers employed.
- c) Ensures working environments are free from physical abuse (actual or threatened), verbal abuse, all forms of harassment including bullying and any other form of intimidation.
- d) Seeks to eliminate all forms of discrimination in access to employment, training and working conditions.
- e) Acknowledges workers have the right to form and join organisations of their own choosing.
- f) Operates without excessive hours, complies with relevant national laws and ensures overtime is only voluntary.
- g) Ensures pay and benefits meet all national standards.
- h) Provides written contracts to workers, detailing the terms and conditions of their employment in an understandable way.

Risk Assessment and Management

Risk assessments are carried out manually at both supplier and category level to varying degrees in accordance with level of risk and value of spend. The risk of modern slavery is not always the same across categories, therefore technology adoption to support the management and mitigation of these risks is being implemented to increase accuracy of identification.

Effectiveness and measurement

As part of our performance monitoring and standard KPIs, suppliers will be required to complete the Modern Slavery Assessment Tool, built in house with the expert guidance from the Slave Free Alliance. This assessment creates a development plan for all suppliers which is then monitored on a regular basis in monthly and quarterly reviews with our Category Management team. We will only work with suppliers that do not use any form of forced, bonded or involuntary labour, and ensure that workers are not treated in a harsh or inhumane way – this is critical to ensure we meet our commitments to reduce the risks and harms of modern slavery.



Staff Training

The OCS Group requires mandatory modern slavery awareness and training for all colleagues. This provides tangible and real-world scenarios to assist our operational teams to see the crime that is known as hidden in plain sight. We plan to share this training with our suppliers in 2024 to ensure they are supported to manage this risk in the same way that we do with our internal teams.

Whistleblowing

We continue to provide a Whistleblowing process via our “Safecall” service, through which any of our colleagues, contractors, customers and members of the general public internationally can report concerns. Reports can be made in several languages and anonymously, alleviating any potential fear of reprisal. Reports can be made on a wide range of concerns that lie within the public interest, including suspicions of modern slavery. The mandatory modern slavery training completed, which will be refreshed on an annual basis, reinforces these processes and procedures.

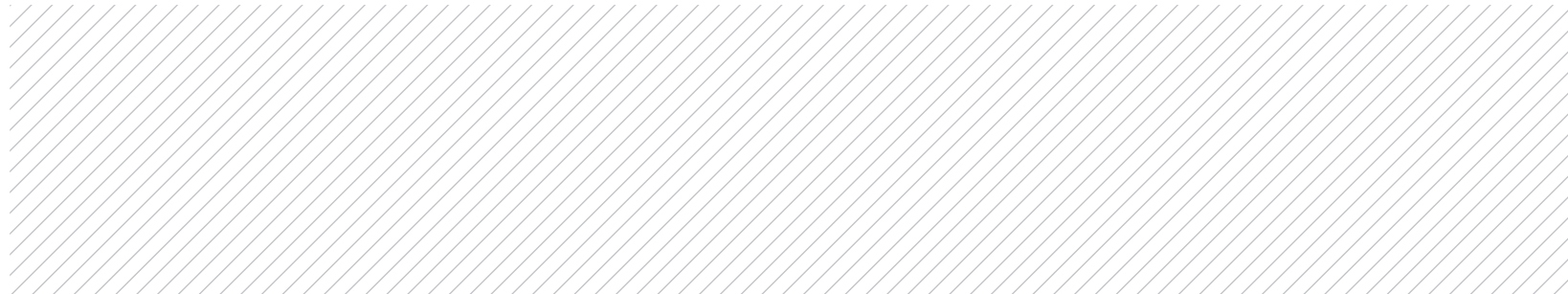
Looking Forward

Over 2024 and into 2025 we will continue to build our robustness in terms of modern slavery processes and policies. The OCS Group will create an action plan from the SFA gap analysis and ensure we follow up on the recommendations in the report. We are also currently developing our Group Foreign Workers Policy which will be introduced later in 2024.

We understand our role in addressing modern slavery and the need for collective action to eradicate this exploitation within society, and will work closely with our suppliers, customer, and colleagues to stop this injustice.

Peter Seeley

Group Head of ESG



Entities covered by this statement

This statement covers OCS Group Topco Limited (company number 14111894) and all its subsidiary undertakings. This includes the following UK subsidiaries with a turnover of £36 million or above in the financial year to 31 December 2023:

- Incentive Facilities Management Limited (company number 04324546)
- OCS M&E Services Limited (company number SC033489)
- OCS Food Co Limited (company number 02569158)
- OCS Security Limited (company number 04376463)
- OCS UK&I Limited (company number 06355228)
- OCS Group UK Limited (company number 03056469)

Approval

This statement was approved by the board of directors for each entity listed above. It is signed by the Group Chief Executive Officer who is also a director of OCS Group Topco Limited.

Rob Legge

Rob Legge
Group CEO

June 2024



OCS Group

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